NMED AIR QUALITY
TITLE V RENEWAL APPLICATION
EL PASO NATURAL GAS COMPANY, L.L.C.
AFTON COMPRESSOR STATION

Prepared By:

Adam Erenstein – Manager of Consulting Services

TRINITY CONSULTANTS
9400 Holly Ave NE
Bldg 3, Suite B
Albuquerque, NM 87122
(505) 266-6611

October 2024

Project 243201.0112

Trinity Consultants

Trinity Consultants
9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122 / P 505.266.6611 / **trinityconsultants.com**

October 18, 2024

Permit Programs Manager
NMED Air Quality Bureau
525 Camino de los Marques, Suite 1
Santa Fe, NM 87505

RE: Application for Title V Renewal
El Paso Natural Gas Company, L.L.C. – Afton Compressor Station

Dear Permit Programs Manager:

On behalf of El Paso Natural Gas Company, L.L.C., we are submitting this application for a Title V Renewal for the Afton Compressor Station. This facility is located approximately 8.5 west of La Mesa, New Mexico in Doña Ana County and compresses pipeline quality natural gas for transportation through transmission pipelines. Afton Compressor Station is currently authorized to operate under NSR Permit 3264-M1 and Title V Operating Permit P136-R4.

The format and content of this application are consistent with the Bureau's current policy regarding Title V applications; it is a complete application package using the most current application forms. Enclosed is one hard copy and one working copy of the application, including the original certification page, electronic files, and an application check. Please feel free to contact me at (505) 266-6611 or by email at aerenstein@trinityconsultants.com if you have any questions regarding this application. Alternatively, you may contact Richard Duarte with El Paso Natural Gas Company, L.L.C. at (505) 269-2794 or by email at Ricardo_Duarte@kindermorgan.com .

Sincerely,

TRINITY CONSULTANTS

Adam Erenstein
Manager of Consulting Services

cc: Richard Duarte (El Paso Natural Gas Company, L.L.C.)
Trinity Project File 243201.0112

Air Permit Application
Compliance History Disclosure Form

Pursuant to Subsection 74-2-7(S) of the New Mexico Air Quality Control Act ("AQCA"), NMSA §§ 74-2-1 to -17, the New Mexico Environment Department ("Department") may deny any permit application or revoke any permit issued pursuant to the AQCA if, within ten years immediately preceding the date of submission of the permit application, the applicant met any one of the criteria outlined below. In order for the Department to deem an air permit application administratively complete, or issue an air permit for those permits without an administrative completeness determination process, the applicant must complete this Compliance History Disclosure Form as specified in Subsection 74-2-7(P). An existing permit holder (permit issued prior to June 18, 2021) shall provide this Compliance History Disclosure Form to the Department upon request.

Permittee/Applicant Company Name		**Expected Application Submittal Date**
El Paso Natural Gas Company, L.L.C.		October 18, 2024
Permittee/Company Contact	**Phone**	**Email**
Richard Duarte	(505) 831-7763	Ricardo_Duarte@kindermorgan.com

	Within the 10 years preceding the expected date of submittal of the application, has the permittee or applicant:	
1	Knowingly misrepresented a material fact in an application for a permit?	☐ Yes ☒ No
2	Refused to disclose information required by the provisions of the New Mexico Air Quality Control Act?	☐ Yes ☒ No
3	Been convicted of a felony related to environmental crime in any court of any state or the United States?	☐ Yes ☒ No
4	Been convicted of a crime defined by state or federal statute as involving or being in restraint of trade, price fixing, bribery, or fraud in any court of any state or the United States?	☐ Yes ☒ No
5a	Constructed or operated any facility for which a permit was sought, including the current facility, without the required air quality permit(s) under 20.2.70 NMAC, 20.2.72 NMAC, 20.2.74 NMAC, 20.2.79 NMAC, or 20.2.84 NMAC?	☐ Yes ☒ No
5b	If "No" to question 5a, go to question 6. If "Yes" to question 5a, state whether each facility that was constructed or operated without the required air quality permit met at least one of the following exceptions: a. The unpermitted facility was discovered after acquisition during a timely environmental audit that was authorized by the Department; or b. The operator of the facility estimated that the facility's emissions would not require an air permit, **and** the operator applied for an air permit within 30 calendar days of discovering that an air permit was required for the facility.	☐ Yes ☐ No
6	Had any permit revoked or permanently suspended for cause under the environmental laws of any state or the United States?	☐ Yes ☒ No
7	For each "yes" answer, please provide an explanation and documentation.	

Mail Application To:		**For Department use only:**
New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb		

Universal Air Quality Permit Application

Use this application for NOI, NSR, or Title V sources.

Use this application for: the initial application, modifications, technical revisions, and renewals. For technical revisions, complete Sections, 1-A, 1-B, 2-E, 3, 9 and any other sections that are relevant to the requested action; coordination with the Air Quality Bureau permit staff prior to submittal is encouraged to clarify submittal requirements and to determine if more or less than these sections of the application are needed. Use this application for streamline permits as well.

This application is submitted as (check all that apply)**:** ☐ Request for a No Permit Required Determination (no fee)
☐ **Updating** an application currently under NMED review. Include this page and all pages that are being updated (no fee required).
Construction Status: ☐ Not Constructed ☐ Existing Permitted (or NOI) Facility ☐ Existing Non-permitted (or NOI) Facility
Minor Source: ☐ a NOI 20.2.73 NMAC ☐ 20.2.72 NMAC application or revision ☐ 20.2.72.300 NMAC Streamline application
Title V Source: ☐ Title V (new) ☑ Title V renewal ☐ TV minor mod. ☐ TV significant mod. TV Acid Rain: ☐ New ☐ Renewal
PSD Major Source: ☐ PSD major source (new) ☐ minor modification to a PSD source ☐ a PSD major modification

Acknowledgements:

☑ I acknowledge that a pre-application meeting is available to me upon request. ☐ Title V Operating, Title IV Acid Rain, and NPR applications have no fees.

☐ $500 NSR application Filing Fee enclosed OR ☐ The full permit fee associated with 10 fee points (required w/ streamline applications). N/A

☐ Check No.: N/A in the amount of N/A

☑ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.

☐ I acknowledge there is an annual fee for permits in addition to the permit review fee: www.env.nm.gov/air-quality/permit-fees-2/.

☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full $500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: www.env.nm.gov/air-quality/small-biz-eap-2/.)

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.70.300.B(2) NMAC**
(e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

Section 1 – Facility Information

Section 1-A: Company Information

		AI # if known (see 1st 3 to 5 #s of permit IDEA ID No.): 123	Updating Permit/NOI #: P136-R4
1	Facility Name: Afton Compressor Station	Plant primary SIC Code (4 digits): 4922	
		Plant NAIC code (6 digits): 486210	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): From La Mesa, head southeast on NM-28 for approximately 3.9 miles. Turn right onto W. Afton Road and go approximately 10.2 miles. Turn right onto an unknown road and go approximately 0.2 miles. Facility will be on the left.		
2	Plant Operator Company Name: El Paso Natural Gas Company, L.L.C.	Phone/Fax: (505) 831-7763 / (505) 831-7734	
a	Plant Operator Address: 2 N. Nevada Ave., Colorado Springs, CO 80903		

b	Plant Operator's New Mexico Corporate ID or Tax ID: 46-0809216	
3	Plant Owner(s) name(s): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (505) 831-7763 / (505) 831-7734
a	Plant Owner(s) Mailing Address(s): 2 N. Nevada Ave., Colorado Springs, CO 80903	
4	Bill To (Company): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (505) 831-7763 / (505) 831-7734
a	Mailing Address: 5151 E. Broadway, Suite 1680, Tucson, AZ 85711	E-mail: Ricardo_Duarte@kindermorgan.com
5	☐ Preparer: ☒ Consultant: Adam Erenstein	Phone/Fax: (505) 266-6611
a	Mailing Address: 9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122	E-mail: aerenstein@trinityconsultants.com
6	Plant Operator Contact: Mike Marrufo	Phone/Fax: (575) 544-5234 / (575) 544-5231
a	Address: 1900 Deming Station Road SW, Deming, NM 88030	E-mail: Miguel_Marrufo@Kindermorgan.com
7	Air Permit Contact: Richard Duarte	Title: Sr. EHS Engineer
a	E-mail: Ricardo_Duarte@kindermorgan.com	Phone/Fax: (505) 831-7763 / (505) 831-7734
b	Mailing Address: 100 Sun Ave, Suite 650, Albuquerque, NM 87109	
c	The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau.	

Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? ☒Yes ☐ No	1.b If yes to question 1.a, is it currently operating in New Mexico? ☒ Yes ☐ No
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application? ☐ Yes ☒ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? ☒ Yes ☐ No
3	Is the facility currently shut down? ☐ Yes ☒ No	If yes, give month and year of shut down (MM/YY): N/A
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? ☒ Yes ☐ No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? ☐Yes ☒No ☐N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? ☒ Yes ☐ No	If yes, the permit No. is: P-136-R4
7	Has this facility been issued a No Permit Required (NPR)? ☐ Yes ☒No	If yes, the NPR No. is: N/A
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☒No	If yes, the NOI No. is: N/A
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ☒Yes ☐ No	If yes, the permit No. is: 3264-M1
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ☒No	If yes, the register No. is: N/A

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 56,250 Mscf	Daily: 1,350,000 Mscf	Annually: 492,750,000 Mscf
b	Proposed	Hourly: 56,250 Mscf	Daily: 1,350,000 Mscf	Annually: 492,750,000 Mscf
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 56,250 Mscf	Daily: 1,350,000 Mscf	Annually: 492,750,000 Mscf

b	Proposed	Hourly: 56,250 Mscf	Daily: 1,350,000 Mscf	Annually: 492,750,000 Mscf

Section 1-D: Facility Location Information

1	Section: 20 & 21	Range: 1E	Township: 25S	County: Doña Ana	Elevation (ft): 4,230
2	UTM Zone: ☐ 12 or ☒ 13			Datum: ☐ NAD 27 ☐ NAD 83 ☒ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 325,200			UTM N (in meters, to nearest 10 meters): 3,554,590	
b	**AND** Latitude (deg., min., sec.): 32°06'51"			Longitude (deg., min., sec.): -106°51'10"	
3	Name and zip code of nearest New Mexico town: La Mesa, 88044				
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From La Mesa, head southeast on NM-28 for approximately 3.9 miles. Turn right onto W. Afton Road and go approximately 10.2 miles. Turn right onto an unknown road and go approximately 0.2 miles. Facility will be on the left.				
5	The facility is 8 miles west of La Mesa, NM.				
6	Status of land at facility (check one): ☒ Private ☐ Indian/Pueblo ☐ Federal BLM ☐ Federal Forest Service ☐ Other (specify)				
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: Municipalities: La Mesa, NM; Mesquite, NM. Counties: Doña Ana County				
8	**20.2.72** NMAC applications **only**: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/air-quality/modeling-publications/)? ☐ Yes ☒ No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: N/A				
9	Name nearest Class I area: Gila Wilderness				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 165.76 km				
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: ~1,700 m				
12	Method(s) used to delineate the Restricted Area: Continuous Fencing "**Restricted Area**" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.				
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? ☐ Yes ☒ No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.				
14	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility?				

Section 1-E: Proposed Operating Schedule (The 1-E.1 & 1-E.2 operating schedules may become conditions in the permit.)

1	Facility **maximum** operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52	($\frac{\text{hours}}{\text{year}}$): 8,760		
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A	☐AM ☐PM	End: N/A	☐AM ☐PM		
3	Month and year of anticipated start of construction: N/A					
4	Month and year of anticipated construction completion: N/A					
5	Month and year of anticipated startup of new or modified facility: N/A					
6	Will this facility operate at this site for more than one year? ☒Yes ☐ No					

Section 1-F: Other Facility Information

1	Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility? ☐ Yes ☒ No If yes, specify: N/A		
a	If yes, NOV date or description of issue: N/A		NOV Tracking No: N/A
b	Is this application in response to any issue listed in 1-F, 1 or 1a above? ☐ Yes ☒ No If Yes, provide the 1c & 1d info below: N/A		
c	Document Title: N/A	Date: N/A	Requirement # (or page # and paragraph #): N/A
d	Provide the required text to be inserted in this permit: N/A		
2	Is air quality dispersion modeling or modeling waiver being submitted with this application? ☐ Yes ☒ No		
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? ☐ Yes ☒ No		
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? ☒ Yes ☐ No		
a	If Yes, what type of source? ☐ **Major** (☐ ≥10 tpy of any single HAP **OR** ☐ ≥25 tpy of any combination of HAPS) **OR** ☒ **Minor** (☒ <10 tpy of any single HAP **AND** ☒ <25 tpy of any combination of HAPS)		
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☐ Yes ☒ No		
a	If yes, include the name of company providing commercial electric power to the facility: _____ Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.		

Section 1-G: Streamline Application (This section applies to 20.2.72.300 NMAC Streamline applications only)

1	☐ I have filled out Section 18, "Addendum for Streamline Applications." ☒ N/A (This is not a Streamline application.)

Section 1-H: Current Title V Information - Required for all applications from TV Sources

(Title V-source required information for all applications submitted pursuant to 20.2.72 NMAC (Minor Construction Permits), or 20.2.74/20.2.79 NMAC (Major PSD/NNSR applications), and/or 20.2.70 NMAC (Title V))

1	Responsible Official (R.O.) (20.2.70.300.D.2 NMAC): Ted Meinhold	Phone: (713) 420-2765
a	R.O. Title: Vice President of Operations	R.O. e-mail: ted_meinhold@kindermorgan.com
b	R. O. Address: 1001 Louisiana, Houston TX 77002	
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC): Philip L Baca	Phone: (520) 663-4224
a	A. R.O. Title: Director of Operations	A. R.O. e-mail: philip_baca@kindermorgan.com
b	A. R. O. Address: 5151 E Broadway, Suite 1680, Tucson AZ 85711	
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship): El Paso Natural Gas Company, L.L.C. was formerly named "El Paso Natural Gas Company" (until 08/06/2012); both names may appear on operating permits and refer to the same company.	
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): Kinder Morgan, Inc.	
a	Address of Parent Company: 1001 Louisiana St., Suite 1000, Houston, TX 77002	
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.): N/A	
6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: Richard Duarte, (505) 831-7763 and Gary Verquer, (575) 544-5234	

7	Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers: States: Texas (~26 km)

Section 1-I – Submittal Requirements

Each 20.2.73 NMAC (**NOI**), a 20.2.70 NMAC (**Title V**), a 20.2.72 NMAC (**NSR** minor source), or 20.2.74 NMAC (**PSD**) application package shall consist of the following:

Hard Copy Submittal Requirements:

1) One hard copy **original signed and notarized application package** **printed double sided** **'head-to-toe'** **2-hole punched** as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be head-to-head. Please use **numbered tab separators** in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required. Please include a copy of the check on a separate page.

2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This copy should be printed in book form, 3-hole punched, and **must be double sided**. Note that this is in addition to the head-to-to 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.

3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, **two** CD copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a single CD submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

Electronic files sent by (check one):

☐CD/DVD attached to paper application

☑ secure electronic transfer. Air Permit Contact Name: Adam Erenstein, Email: aerenstein@trinityconsultants.com
Phone number: (505) 266-6611 .

a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.**

4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.

5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling ***summary report only*** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.

6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
   a. one additional CD copy for US EPA,
   b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
   c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

   If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

Electronic Submittal Requirements [in addition to the required hard copy(ies)]:

1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.

2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the text and formulas in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically: i.e. brochures, maps, graphics, etc,), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.

3) It is preferred that this application form be submitted as 4 electronic files (3 MSWord docs: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and 1 Excel file of the tables (Universal Application section 2 [UA2]). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.

4) The electronic file names shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: "A-3423-FacilityName". The "A" distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with "A-". Modifications to existing facilities should use the core permit number (i.e. '3423') the Department assigned to the facility as the next 4 digits. Use 'XXXX' for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: "A-3423-9-description", where "9" stands for the section # (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the header information throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

Table of Contents

Table 2-A: Regulated Emission Sources

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

Unit Number[1]	Source Description	Make	Model #	Serial #	Manufact-urer's Rated Capacity[3] (Specify Units)	Requested Permitted Capacity[3] (Specify Units)	Date of Manufacture[2] Date of Construction/ Reconstruction[2]	Controlled by Unit # Emissions vented to Stack #	Source Classi-fication Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB)[4]	Replacing Unit No.
A-1	Regenerative Cycle Turbine	General Electric	M3712R	95057	7150 hp	6150 hp	7/1/1953 7/1953	N/A A-1	31000203	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
A-2	Regenerative Cycle Turbine	General Electric	M3712R	95061	7150 hp	6150 hp	7/1/1953 7/1953	N/A A-2	31000203	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
A-3	Regenerative Cycle Turbine	General Electric	M3712R	95063	7150 hp	6150 hp	7/1/1953 11/1953	N/A A-3	31000203	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
F-001	Facility-Wide Fugitives	-	-	-	-	-	- -	- -	31088811	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
SSM/M	Blowdown Vent (SSM Vent)	-	-	-	-	-	- -	- -	40600502	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		

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[1] Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.

[2] Specify dates required to determine regulatory applicability.

[3] To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.

[4] "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

Table 2-B: Insignificant Activities[1] (20.2.70 NMAC) OR Exempted Equipment (20.2.72 NMAC)

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb_pol.html), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at https://www.env.nm.gov/wp-content/uploads/sites/2/2017/10/InsignificantListTitleV.pdf. TV sources may elect to enter both TV Insignificant Activities and Part 72 Exemptions on this form.

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction[2]	For Each Piece of Equipment, Check Onc
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction[2]	
T-001	Lube Oil Storage Tank	-	-	6,300	-	-	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			-	gal	IA List Item #5	Jan-52	
T-002	Oil Recovery Tank	-	-	500	-	-	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			-	gal	IA List Item #5	Jan-86	
T-004	Oil Recovery Tank	-	-	250	-	-	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			-	gal	IA List Item #5	Jan-86	
T-005	Ambitrol Surge Tank	-	-	1,500	-	-	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			-	gal	IA List Item #5	2004	
T-006	Scr Blowdown Tank	-	-	8,820	-	-	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			-	gal	IA List Item #5	2006	
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced

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[1] Insignificant activities exempted due to size or production rate are defined in 20.2.70.300.D.6, 20.2.70.7.Q NMAC, and the NMED/AQB List of Insignificant Activities, dated September 15, 2008. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

[2] Specify date(s) required to determine regulatory applicability.

Table 2-C: Emissions Control Equipment

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72 NMAC, Subpart V, Tables A and B. In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions.

Control Equipment Unit No.	Control Equipment Description	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s)[1]	Efficiency (% Control by Weight)	Method used to Estimate Efficiency
N/A-There are no control devices installed at this facility.						

[1] List each control device on a separate line. For each control device, list all emission units controlled by the control device.

Table 2-D: Maximum Emissions (under normal operating conditions)

☑ **This Table was intentionally left blank because it would be identical to Table 2-E.**

Maximum Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, emission-reducing process equipment, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	NOx		CO		VOC		SOx		PM[1]		PM10[1]		PM2.5[1]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Totals																		

[1]**Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

Table 2-E: Requested Allowable Emissions

Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or $1.41E^{-4}$).

Unit No.	NOx		CO		VOC		SOx		PM[1]		PM10[1]		PM2.5[1]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
A-1	51.3	224.5	8.1	35.7	0.4	1.8	0.42	1.8	0.41	1.8	0.41	1.8	0.41	1.8	-	-	-	-
A-2	51.3	224.5	8.1	35.7	0.4	1.8	0.42	1.8	0.41	1.8	0.41	1.8	0.41	1.8	-	-	-	-
A-3	51.3	224.5	8.1	35.7	0.4	1.8	0.42	1.8	0.41	1.8	0.41	1.8	0.41	1.8	-	-	-	-
F-001	-	-	-	-	1.3	5.9	-	-	-	-	-	-	-	-	-	-	-	-
Totals	153.8	673.5	24.4	107.1	2.6	11.2	1.2	5.4	1.2	5.4	1.2	5.4	1.2	5.4	-	-	-	-

[1] **Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

Table 2-F: Additional Emissions during Startup, Shutdown, and Routine Maintenance (SSM)

☐ This table is intentionally left blank since all emissions at this facility due to routine or predictable startup, shutdown, or scehduled maintenance are no higher than those listed in Table 2-E and a malfunction emission limit is not already permitted or requested. If you are required to report GHG emissions as described in Section 6a, include any GHG emissions during Startup, Shutdown, and/or Scheduled Maintenance (SSM) in Table 2-P. Provide an explanations of SSM emissions in Section 6 and 6a.

All applications for facilities that have emissions during routine our predictable startup, shutdown or scheduled maintenance (SSM)[1], including NOI applications, must include in this table the Maximum Emissions during routine or predictable startup, shutdown and scheduled maintenance (20.2.7 NMAC, 20.2.72.203.A.3 NMAC, 20.2.73.200.D.2 NMAC). In Section 6 and 6a, provide emissions calculations for all SSM emissions reported in this table. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (https://www.env.nm.gov/aqb/permit/aqb_pol.html) for more detailed instructions. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	NOx		CO		VOC		SOx		PM[2]		PM10[2]		PM2.5[2]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
SSM/M	-	-	-	-	*	10	-	-	-	-	-	-	-	-	0.19	0.080	-	-
Totals	-	-	-	-	*	10	-	-	-	-	-	-	-	-	0.19	0.080	-	-

[1] **For instance**, if the short term steady-state Table 2-E emissions are 5 lb/hr and the SSM rate is 12 lb/hr, enter 7 lb/hr in this table. If the annual steady-state Table 2-E emissions are 21.9 TPY, and the number of scheduled SSM events result in annual emissions of 31.9 TPY, enter 10.0 TPY in the table below.

[2] **Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

Table 2-G: Stack Exit and Fugitive Emission Rates for Special Stacks

☒ I have elected to leave this table blank because this facility does not have any stacks/vents that split emissions from a single source or combine emissions from more than one source listed in table 2-A. Additionally, the emission rates of all stacks match the Requested allowable emission rates stated in Table 2-E.

Use this table to list stack emissions (requested allowable) from split and combined stacks. List Toxic Air Pollutants (TAPs) and Hazardous Air Pollutants (HAPs) in Table 2-I. List all fugitives that are associated with the normal, routine, and non-emergency operation of the facility. Unit and stack numbering must correspond throughout the application package. Refer to Table 2-E for instructions on use of the "-" symbol and on significant figures.

Stack No.	Serving Unit Number(s) from Table 2-A	NOx		CO		VOC		SOx		PM		PM10		PM2.5		□ H_2S or □ Lead	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Totals:																	

Table 2-H: Stack Exit Conditions

Unit and stack numbering must correspond throughout the application package. Include the stack exit conditions for each unit that emits from a stack, including blowdown venting parameters and tank emissions. If the facility has multiple operating scenarios, complete a separate Table 2-H for each scenario and, for each, type scenario name here:

Stack Number	Serving Unit Number(s) from Table 2-A	Orientation (H-Horizontal V=Vertical)	Rain Caps (Yes or No)	Height Above Ground (ft)	Temp. (F)	Flow Rate		Moisture by Volume (%)	Velocity (ft/sec)	Inside Diameter (ft)
						(acfs)	(dscfs)			
A-1	A-1	V	No	51	580	2601	2471	5	92	6.00
A-2	A-2	V	No	51	580	2601	2471	5	92	6.00
A-3	A-3	V	No	51	580	2601	2471	5	92	6.00

Table 2-I: Stack Exit and Fugitive Emission Rates for HAPs and TAPs

In the table below, report the Potential to Emit for each HAP from each regulated emission unit listed in Table 2-A, only if the entire facility emits the HAP at a rate greater than or equal to one (1) ton per year For each such emission unit, HAPs shall be reported to the nearest 0.1 tpy. Each facility-wide Individual HAP total and the facility-wide Total HAPs shall be the sum of all HAP sources calculated to the nearest 0.1 ton per year. Per 20.2.72.403.A.1 NMAC, facilities not exempt [see 20.2.72.402.C NMAC] from TAP permitting shall report each TAP that has an uncontrolled emission rate in excess of its pounds per hour screening level specified in 20.2.72.502 NMAC. TAPs shall be reported using one more significant figure than the number of significant figures shown in the pound per hour threshold corresponding to the substance. Use the HAP nomenclature as it appears in Section 112 (b) of the 1990 CAAA and the TAP nomenclature as it listed in 20.2.72.502 NMAC. Include tank-flashing emissions estimates of HAPs in this table. For each HAP or TAP listed, fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected or the pollutant is emitted in a quantity less than the threshold amounts described above.

Stack No.	Unit No.(s)	Total HAPs		Acetaldehyde ☒ HAP or ☐ TAP		Formaldehyde ☒ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
A-1	A-1	0.66	2.9	0.27	1.2	0.27	1.2												
A-2	A-2	0.66	2.9	0.27	1.2	0.27	1.2												
A-3	A-3	0.66	2.9	0.27	1.2	0.27	1.2												
-	SSM/M	*	0.040	-	-	-	-												
-	F-001	0.0054	0.024	-	-	-	-												
Totals:		2.0	8.7	0.82	3.6	0.80	3.5												

Table 2-J: Fuel

Specify fuel characteristics and usage. Unit and stack numbering must correspond throughout the application package.

Unit No.	Fuel Type (low sulfur Diesel, ultra low sulfur diesel, Natural Gas, Coal, …)	Fuel Source: purchased commercial, pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Specify Units				
			Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
A-1	Natural Gas	Pipeline Quality Natural Gas	925 BTU/scf	58.2 Mscf	509.5 MMscf	Neg.	Neg.
A-2	Natural Gas	Pipeline Quality Natural Gas	925 BTU/scf	58.2 Mscf	509.5 MMscf	Neg.	Neg.
A-3	Natural Gas	Pipeline Quality Natural Gas	925 BTU/scf	58.2 Mscf	509.5 MMscf	Neg.	Neg.

Table 2-K: Liquid Data for Tanks Listed in Table 2-L

For each tank, list the liquid(s) to be stored in each tank. If it is expected that a tank may store a variety of hydrocarbon liquids, enter "mixed hydrocarbons" in the Composition column for that tank and enter the corresponding data of the most volatile liquid to be stored in the tank. If tank is to be used for storage of different materials, list all the materials in the "All Calculations" attachment, run the newest version of TANKS on each, and use the material with the highest emission rate to determine maximum uncontrolled and requested allowable emissions rate. The permit will specify the most volatile category of liquids that may be stored in each tank. Include appropriate tank-flashing modeling input data. Use additional sheets if necessary. Unit and stack numbering must correspond throughout the application package.

Tank No.	SCC Code	Material Name	Composition	Liquid Density (lb/gal)	Vapor Molecular Weight (lb/lb*mol)	Average Storage Conditions		Max Storage Conditions	
						Temperature (°F)	True Vapor Pressure (psia)	Temperature (°F)	True Vapor Pressure (psia)
N/A-All tanks at this facility are insignificant activities. See Table 2-B for specific citations.									

Table 2-L: Tank Data

Include appropriate tank-flashing modeling input data. Use an addendum to this table for unlisted data categories. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary. See reference Table 2-L2. Note: 1.00 bbl = 10.159 M3 = 42.0 gal

Tank No.	Date Installed	Materials Stored	Seal Type (refer to Table 2-LR below)	Roof Type (refer to Table 2-LR below)	Capacity		Diameter (M)	Vapor Space (M)	Color (from Table VI-C)		Paint Condition (from Table VI-C)	Annual Throughput (gal/yr)	Turn-overs (per year)
					(bbl)	(M^3)			Roof	Shell			
N/A-All tanks at this facility are insignificant activities. See Table 2-B for specific citations.													

Table 2-L2: Liquid Storage Tank Data Codes Reference Table

Roof Type	Seal Type, Welded Tank Seal Type		Seal Type, Riveted Tank Seal Type		Roof, Shell Color	Paint Condition
FX: Fixed Roof	**Mechanical Shoe Seal**	**Liquid-mounted resilient seal**	**Vapor-mounted resilient seal**	**Seal Type**	**WH**: White	Good
IF: Internal Floating Roof	**A**: Primary only	**A**: Primary only	**A**: Primary only	**A**: Mechanical shoe, primary only	**AS**: Aluminum (specular)	Poor
EF: External Floating Roof	**B**: Shoe-mounted secondary	**B**: Weather shield	**B**: Weather shield	**B**: Shoe-mounted secondary	**AD**: Aluminum (diffuse)	
P: Pressure	**C**: Rim-mounted secondary	**C**: Rim-mounted secondary	**C**: Rim-mounted secondary	**C**: Rim-mounted secondary	**LG**: Light Gray	
					MG: Medium Gray	
					BL: Black	
					OT: Other (specify)	

Note: 1.00 bbl = 0.159 M^3 = 42.0 gal

Table 2-M: Materials Processed and Produced (Use additional sheets as necessary.)

Material Processed				Material Produced			
Description	**Chemical Composition**	**Phase (Gas, Liquid, or Solid)**	**Quantity (specify units)**	**Description**	**Chemical Composition**	**Phase**	**Quantity (specify units)**
N/A-This facility is a natural gas compressor station; no material is processed at this facility.							

Table 2-N: CEM Equipment

Enter Continuous Emissions Measurement (CEM) Data in this table. If CEM data will be used as part of a federally enforceable permit condition, or used to satisfy the requirements of a state or federal regulation, include a copy of the CEM's manufacturer specification sheet in the Information Used to Determine Emissions attachment. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

Stack No.	Pollutant(s)	Manufacturer	Model No.	Serial No.	Sample Frequency	Averaging Time	Range	Sensitivity	Accuracy
N/A-There is no CEM equipment at this facility.									

Table 2-O: Parametric Emissions Measurement Equipment

Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

Unit No.	Parameter/Pollutant Measured	Location of Measurement	Unit of Measure	Acceptable Range	Frequency of Maintenance	Nature of Maintenance	Method of Recording	Averaging Time
N/A-There is no PEM equipment at this facility.								

Table 2-P: Greenhouse Gas Emissions

Applications submitted under 20.2.70, 20.2.72, & 20.2.74 NMAC are required to complete this Table. Power plants, Title V major sources, and PSD major sources must report and calculate all GHG emissions for each unit. Applicants must report potential emission rates in short tons per year (see Section 6.a for assistance). Include GHG emissions during Startup, Shutdown, and Scheduled Maintenance in this table. For minor source facilities that are not power plants, are not Title V, or are not PSD, there are three options for reporting GHGs 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHG as a second separate unit; OR 3) check the following box ☐ By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

		CO_2 ton/yr	N_2O ton/yr	CH_4 ton/yr	SF_6 ton/yr	PFC/HFC ton/yr[2]									Total GHG Mass Basis ton/yr[4]	Total CO_2e ton/yr[5]
Unit No.	**GWPs** [1]	**1**	**298**	**25**	**22,800**	**footnote 3**										
A-1	**mass GHG**	32043.5	0.06	0.6											32044.2	
	CO_2e	32043.5	18.0	15.1												32076.6
A-2	**mass GHG**	32043.5	0.06	0.6											32044.2	
	CO_2e	32043.5	18.0	15.1												32076.6
A-3	**mass GHG**	32043.5	0.06	0.6											32044.2	
	CO_2e	32043.5	18.0	15.1												32076.6
F-001	**mass GHG**			169.2											169.2	
	CO_2e			4229												4228.9
SSM/M	**mass GHG**	16.3		440.8											457.1	
	CO_2e	16.3		11019												11035.6
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
Total	**mass GHG**	96146.9	0.2	611.7											96758.8	
	CO_2e	96146.9	54.0	15293.4												111494.3

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[1] **GWP** (Global Warming Potential): Applicants must use the most current GWPs codified in Table A-1 of 40 CFR part 98. GWPs are subject to change, therefore, applicants need to check 40 CFR 98 to confirm GWP values.

[2] For **HFCs** or **PFCs** describe the specific HFC or PFC compound and use a separate column for each individual compound.

[3] For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

[4] Green house gas emissions on a **mass basis** is the ton per year green house gas emission before adjustment with its GWP.

[5] **CO_2e** means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

Section 3

Application Summary

The **Application Summary** shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

The **Process Summary** shall include a brief description of the facility and its processes.

Startup, Shutdown, and Maintenance (SSM) routine or predictable emissions: Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

This application is being submitted for the renewal of Operating Permit P136-R4 for the Afton Compressor Station. The facility is owned and operated by El Paso Natural Gas Company, L.L.C. (EPNG), a Kinder Morgan company. This submittal is pursuant to 20.2.70.300.B.(2) NMAC, which requires a Title V application be submitted at least twelve months prior to the expiration of the current permit. Title V Permit P136-R4 expires on October 29, 2025.

Afton Compressor Station is a compressor station which compresses natural gas for transportation purposes. Equipment at this facility includes three GE M3712R regenerative cycle turbines (A-1, A-2 and A-3). Other regulated emission sources include facility-wide fugitives (F-001), and a blowdown vent (SSM/M) for startup, shutdown and routine maintenance (SSM) emissions. Insignificant activities include five storage tanks (T-001, T-002, T-004, T-005 and T-006).

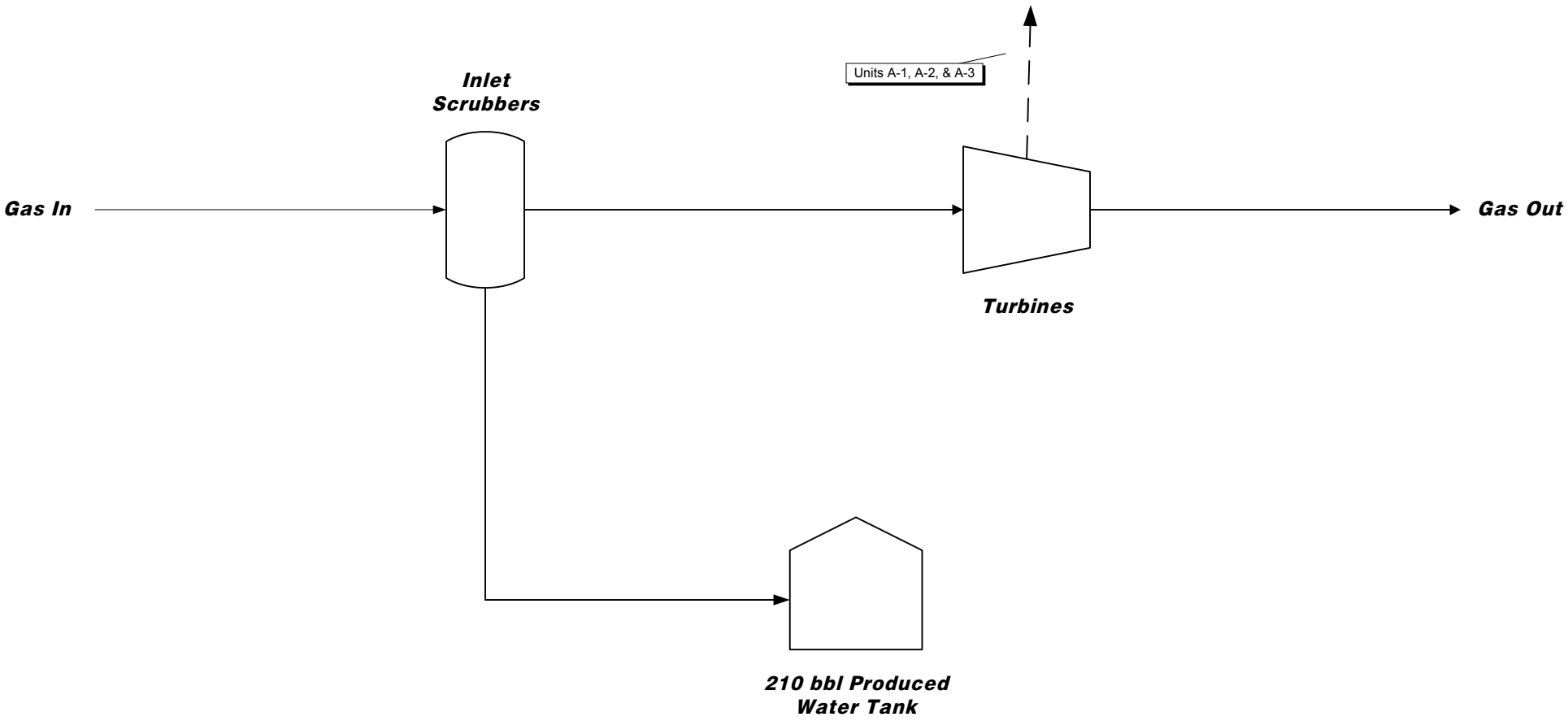
Afton Compressor Station is a Title V major facility. The facility is also an existing PSD major source that is grandfathered from PSD permitting and the facility has not undergone a major modification. There will be no change to the status of the facility under these rules with this renewal. The facility will also remain a minor source of hazardous air pollutants (HAPs). There have been no physical or operational changes at this facility since the issuance of the previous Title V Operating Permit, P136-R4.

Section 4

Process Flow Sheet

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.

A process flow diagram is attached.



Legend

Emission Unit No.

Stack Emissions

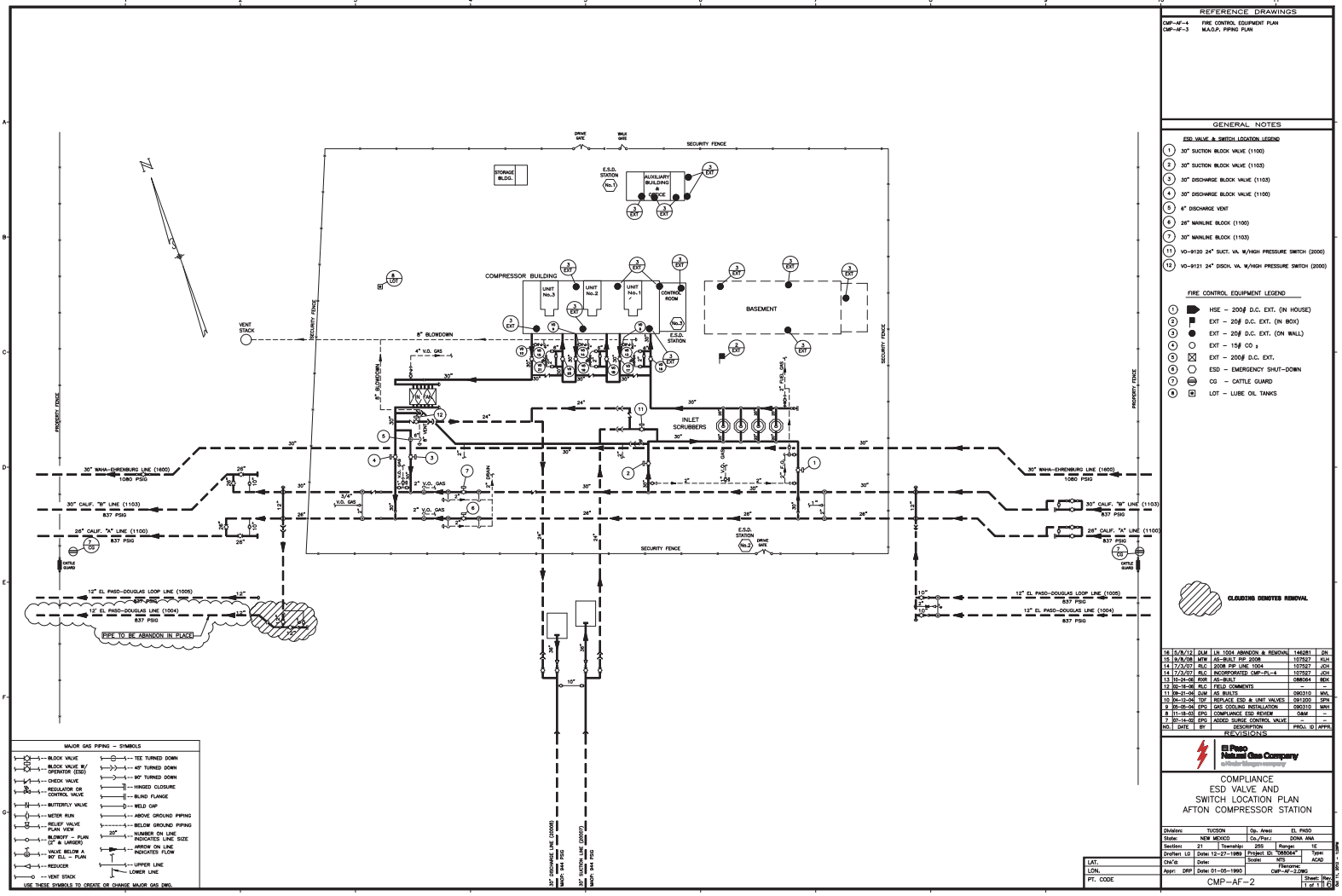
Process Flow Diagram
Afton Compressor Station

Section 5

Plot Plan Drawn To Scale

A **plot plan drawn to scale** showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

A plot plan for the facility is attached.



REFERENCE DRAWINGS

CMP-AF-4 FIRE CONTROL EQUIPMENT PLAN
CMP-AF-3 M.A.O.P. PIPING PLAN

GENERAL NOTES

ESD VALVE & SWITCH LOCATION LEGEND

1. 30" SUCTION BLOCK VALVE (1100)
2. 30" SUCTION BLOCK VALVE (1103)
3. 30" DISCHARGE BLOCK VALVE (1103)
4. 30" DISCHARGE BLOCK VALVE (1100)
5. 6" DISCHARGE VENT
6. 26" MAINLINE BLOCK (1100)
7. 30" MAINLINE BLOCK (1103)
11. VO-9120 24" SUCT. VA W/HIGH PRESSURE SWITCH (2000)
12. VO-9121 24" DISCH. VA. W/HIGH PRESSURE SWITCH (2000)

FIRE CONTROL EQUIPMENT LEGEND

1. HSE – 200# D.C. EXT. (IN HOUSE)
2. EXT – 20# D.C. EXT. (ON BOX)
3. EXT – 20# D.C. EXT. (ON WALL)
4. EXT – 15# CO_2
5. EXT – 200# D.C. EXT.
6. ESD – EMERGENCY SHUT-DOWN
7. CG – CATTLE GUARD
8. LOT – LUBE OIL TANKS

CLOUDING DENOTES REMOVAL

NO.	DATE	BY	DESCRIPTION	PROJ. ID	APPR.
16	5/8/12	DJM	LN 1004 ABANDON & REMOVAL	140281	DN
15	9/8/08	MTW	AS-BUILT PIP 2008	107527	KLH
14	7/3/07	RLC	2008 PIP LINE 1004	107527	JDH
13	10-24-06	RWR	INCORPORATED CMP-PL-4	107527	JDH
12	02-16-06	RLC	AS-BUILT	086064	BDK
11	09-21-04	DJM	FIELD COMMENTS	–	–
10	04-13-04	TDF	AS BUILTS	090310	MVL
9	05-05-04	EPG	REPLACE ESD & UNIT VALVES	091200	SPN
8	11-18-03	EPG	COMPLIANCE ESD INSTALLATION	090310	MAH
7	07-14-00	EPG	COMPLIANCE ESD REVIEW	O&M	–
			ADDED SURGE CONTROL VALVE	–	–

REVISIONS

El Paso Natural Gas Company
a Kinder Morgan company

COMPLIANCE ESD VALVE AND SWITCH LOCATION PLAN AFTON COMPRESSOR STATION

Division:	TUCSON	Op. Area:	EL PASO
State:	NEW MEXICO	Co./Par.:	DONA ANA
Section:	21	Township:	25S
Ranges:	1E
Drafter: LG	Date: 12-27-1989	Project ID: "085064"	Type:
Chk'd:	Date:	Scale: NTS	ACAD
Appr: DRP	Date: 01-05-1990	Filename: CMP-AF-2.DWG	

CMP-AF-2

Sheet: 1 of 1 | Rev: C

LAT.
LON.
PT. CODE

MAJOR GAS PIPING – SYMBOLS

- BLOCK VALVE
- BLOCK VALVE W/ OPERATOR (ESD)
- CHECK VALVE
- REGULATOR OR CONTROL VALVE
- BUTTERFLY VALVE
- METER RUN
- RELIEF VALVE PLAN VIEW
- BLOWOFF – PLAN (2" & LARGER)
- VALVE BELOW A 90° ELL – PLAN
- REDUCER
- VENT STACK
- TEE TURNED DOWN
- 45° TURNED DOWN
- 90° TURNED DOWN
- HINGED CLOSURE
- BLIND FLANGE
- WELD CAP
- ABOVE GROUND PIPING
- BELOW GROUND PIPING
- NUMBER ON LINE INDICATES LINE SIZE
- ARROW ON LINE INDICATES FLOW
- UPPER LINE
- LOWER LINE

USE THESE SYMBOLS TO CREATE OR CHANGE MAJOR GAS DWG.

Section 6

All Calculations

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

SSM Calculations: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

Glycol Dehydrator Calculations: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

Significant Figures:
A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.
B. At least 5 significant figures shall be retained in all intermediate calculations.
C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

(1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
(2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
(3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
(4) The final result of the calculation shall be expressed in the units of the standard.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the

application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

Emission sources at Afton Compressor Station include the following:

- Three GE M3712R regenerative cycle turbines
- Facility-wide fugitive emissions
- A blowdown vent (SSM/M)

Emission calculations are reproduced from previous applications for all emission sources.

General Electric M3712R Turbines (A-1, A-2 and A-3)

The emission rates for NOx, CO and VOCs were calculated using testing data. The testing data was taken from various GE M3572R turbines and used to create an emission factor. The SO_2 emission rate was calculated using a maximum sulfur content in the fuel of 5grains/100scf. HAP emissions were calculated using GRI-HAPCalc 3.01. The ISO horsepower was used for these calculations, instead of the site-rated horsepower. This provides a 16% safety factor on the emission rates.

Greenhouse gas emission rates were calculated using the emission factors (in kg/MMBtu) from Tables C-1 and C-2 in 40 CFR 98 Subpart C and the heat input rate of the turbines (in Btu/hp-hr)

Fugitives (F-001)

The fugitive emissions for the facility were calculated using the 1993 Protocol for Equipment Leak Emission Estimates (EPA-453/R-93-026). The emission rates using these factors provide a total organic carbon (TOC) emission rate. A representative gas analysis was used to calculate the VOC emission rate. Since the available gas analysis for the facility does not include a breakdown of HAP constituents, GRI-HAPCalc was used to determine the fugitive HAP emission rate.

Greenhouse gas emissions were calculated by multiplying the TOC emission rate by the ratio of methane to TOC in the representative gas analysis. This value was multiplied by the global warming potential of methane to calculate the emission rate in CO_2e.

Startup, Shutdown and Maintenance (SSM)

Unit Blowdown

The attached spreadsheet shows the estimated VOC emissions per unit blowdown event, as well as the estimated annual blowdown emissions based on an estimated annual volume for a particular calendar year and a typical gas analysis. Please note, however, that the annual estimate includes both unit blowdowns and station blowdowns (which are discussed later). This annual estimate is intended to show a typical annual emission rate, and does not represent the facility's potential-to-emit (PTE).

Turbine Starting Gas

The starting gas volume for these units is measured. The amount of starting gas varies widely based on the duration of the startup sequence. As a very conservative estimate in the attached calculation spreadsheet, a volume of 150 Mscf of starting gas per startup event was assumed. On this basis, the estimated VOC emissions per startup event are 135 lb/event.

The annual emissions estimates in the spreadsheet are based on the measured volumes for a particular calendar year. Again, this annual estimate is intended to show a typical annual emission rate, and does not represent the facility's PTE.

Station Blowdown

The attached spreadsheet shows the estimated emissions of volatile organic compounds (VOC) per station blowdown event. The annual emissions related to station blowdown are included as described above for unit blowdowns.

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO_2), nitrous oxide (N_2O), methane (CH_4), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO_2e emissions from your facility.
2. GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO_2e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO_2e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO2e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at http://www.epa.gov/ttn/chief/ap42/index.html
- EPA's Internet emission factor database WebFIRE at http://cfpub.epa.gov/webfire/
- 40 CFR 98 Mandatory Green House Gas Reporting except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.
- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases:

Global Warming Potentials (GWP):
Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO_2 over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. **(20.2.70.7 NMAC, 20.2.74.7 NMAC).** You may also find GHGs defined in 40 CFR 86.1818-12(a).

Metric to Short Ton Conversion:
Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.
1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

General Electric M3712R Turbines (A-1, A-2 and A-3)

Greenhouse gas emission rates were calculated using the emission factors (in kg/MMBtu) from Tables C-1 and C-2 in 40 CFR 98 Subpart C and the heat input rate of the turbines (in Btu/hp-hr)

Fugitives (F-001)

The fugitive emissions for the facility were calculated using the 1993 Protocol for Equipment Leak Emission Estimates (EPA-453/R-93-026). A representative gas analysis was used to calculate the GHG emission rate.

Greenhouse gas emissions were calculated by multiplying the TOC emission rate by the ratio of methane to TOC in the representative gas analysis. This value was multiplied by the global warming potential of methane to calculate the emission rate in CO_2e.

Startup, Shutdown and Maintenance (SSM)

Unit Blowdown

The attached spreadsheet shows the estimated GHG emissions per unit blowdown event, as well as the estimated annual blowdown emissions based on an estimated annual volume for a particular calendar year and a typical gas analysis. Please note, however, that the annual estimate includes both unit blowdowns and station blowdowns (which are discussed later). This annual estimate is intended to show a typical annual emission rate and does not represent the facility's potential-to-emit (PTE).

Turbine Starting Gas

The starting gas volume for these units is measured. The amount of starting gas varies widely based on the duration of the startup sequence. As a very conservative estimate in the attached calculation spreadsheet, a volume of 150 Mscf of starting gas per startup event was assumed. On this basis, the estimated GHG emissions per startup event are 135 lb/event.

The annual emissions estimates in the spreadsheet are based on the measured volumes for a particular calendar year. Again, this annual estimate is intended to show a typical annual emission rate, and does not represent the facility's PTE.

Station Blowdown

The attached spreadsheet shows the estimated emissions of GHGs per station blowdown event. The annual emissions related to station blowdown are included as described above for unit blowdowns.

El Paso Natural Gas Company, LLC

Afton Compressor Station

Criteria Pollutant Emission Summary

	NO_x		CO		VOC		SO_2		H_2S		TSP		PM_{10}		$PM_{2.5}$	
Unit	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**
A-1	51.3	224.5	8.1	35.7	0.41	1.8	0.42	1.8	-	-	0.41	1.8	0.41	1.8	0.41	1.8
A-2	51.3	224.5	8.1	35.7	0.41	1.8	0.42	1.8	-	-	0.41	1.8	0.41	1.8	0.41	1.8
A-3	51.3	224.5	8.1	35.7	0.41	1.8	0.42	1.8	-	-	0.41	1.8	0.41	1.8	0.41	1.8
SSM/M	-	-	-	-	*	10	-	-	0.19	0.080	-	-	-	-	-	-
F-001	-	-	-	-	1.3	5.9	-	-	-	-	-	-	-	-	-	-
Totals	**153.8**	**673.5**	**24.4**	**107.1**	**2.6**	**21.2**	**1.2**	**5.4**	**0.19**	**0.080**	**1.2**	**5.4**	**1.2**	**5.4**	**1.2**	**5.4**

HAP and GHG Emission Summary

	Acetaldehyde		Formaldehyde		Total HAPs		CO2e
Unit	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**lb/hr**	**tons/yr**	**tons/yr**
A-1	0.27	1.2	0.27	1.2	0.66	2.9	32076.6
A-2	0.27	1.2	0.27	1.2	0.66	2.9	32076.6
A-3	0.27	1.2	0.27	1.2	0.66	2.9	32076.6
SSM/M	-	-	-	-	*	0.040	11035.6
F-001	-	-	-	-	0.0054	0.024	4228.9
Totals	**0.82**	**3.6**	**0.80**	**3.5**	**2.0**	**8.7**	**111494.3**

El Paso Natural Gas Company, LLC

Afton Compressor Station

Units: A-1, A-2, A-3
Description: GE Regenerative Cycle Turbines

ISO Rating:	7150	hp		
Site Rating:	6150	hp		
Fuel Heating Value:	925	Btu/scf		
Heat Input Rate:	8747	Btu/hp-hr	or	0.008747 MMBtu/hp-hr

Criteria Pollutant Emission Calculations

	NO_x[1]	CO[1]	VOC[1]	SO_2[2]	Acetaldehyde[3]	Formaldehyde[3]	Total HAPs[3]	TSP[4,5]	PM_{10}	$PM_{2.5}$	
								6.60E-03	6.60E-03	6.60E-03	lb/MMBtu
EF	51.3	8.1	0.13	0.42	0.27	0.27	0.66	0.41	0.41	0.41	lb/hr
	224.5	35.7	0.55	1.8	1.2	1.2	2.9	1.8	1.8	1.8	tons/yr lb/hr * 8760 hr/yr * 1ton/2000lb
			225%								Safety Factor
	51.3	8.1	0.4	0.42	0.27	0.27	0.66	0.41	0.41	0.41	lb/hr (requested)
	224.5	35.7	1.8	1.8	1.2	1.2	2.9	1.8	1.8	1.8	tpy (requested)

[1] Emission rates from testing data (included in this application package)

[2] SO_2 emission rate based on sulfur content of 5gr S/100scf

[3] HAP tpy emission rate from GRI-HAPCalc 3.01 with 16% safety factor (using ISO hp instead of derate hp);
HAP emissions exceed VOC emissions as a result of conservative HAP emission factors and the 16% safety factor, instead of using testing data

[4] All PM lb/hr Emission Rate = EF (lb/MMBtu) * Fuel Consumption (MMBtu/hp-hr) * hp (ISO Rating value)
From lb/hr, tpy Emission Rate = lb/hr * Yearly Operating Hours * 1ton/2000lb

[5] EF from AP42 3.1 Table 3.1-2a: Emission Factors for Criteria Pollutants and Greenhouse Gases from Stationary Gas Turnbines

GHG Emission Calculations

	CO_2	N_2O	CH_4	
EF	53.06	1.00E-04	1.00E-03	kg/MMBtu
	7315.9	0.014	0.14	lb/hr
	32043.524	0.060	0.60	tons/yr
	32043.524	18.0	15.1	tons/yr CO_2e

El Paso Natural Gas Company, LLC

Afton Compressor Station

Unit: F-001
Description: Facility-wide fugitives

Max. hours of operation per year: 8,760 hr/yr

Emission Source:	Number**	Emission Factor*** (kg/hr/source)	Emission Factor*** (lb/hr/source)	Product: (lb/hr)
Valves:	692	0.0200	0.04409	30.511
Relief Valves	12	0.1880	0.41446	4.974
Open-Ended Lines:	26	0.0220	0.04850	1.261
Compressor Seals:	6	0.2040	0.44974	2.698
Pump Seals (Liq. Service):	0	0.0630	0.13889	0.000
Flanges & Connections:	1,361	0.0011	0.00243	3.300
Total # of Components:	2,097		Total Emissions Factor:	42.745 (lb/hr)

Total Fugitive Emissions Factor: 42.745 lb/hr
Wt. fraction of non-methane, non-ethane HC / THC: 3.13%
Wt. fraction of methane / THC: 90.349%

Fugitive VOCs: 1.34 lb/hr
Fugitive VOCs: 5.87 tpy

Fugitive CH_4: 4228.9 tpy CO_2e

Fugitive VOC Calculation:

42.7450 LB/HR THC X 0.0313 wt. fraction NMNEHC/THC = 1.3379 LB/HR fugitive VOCs

1.3400 LB/HR X 8760 HRS/YR / 2000 LB/TON = 5.8692 TPY

**number based on a representative component count per process unit multiplied by the number of process units
*** based on EPA-453/R-93-026 (Table 2-3: Gas Plant Average Emission Factors - Total Organic Compounds, TOC)

Fugitive HAP emissions (from GRI-HAPCalc):

HAP	lb/hr	tpy
Benezene	0.0017	0.0073
Toluene	0.0028	0.0124
Ethylbenzene	0.00014	0.0006
Xylenes	0.00073	0.0032
Totals	**0.0054**	**0.0235**

HAPCalc Inputs:
Combined Valves and PRVs into "Valves"--> 648 valves
1040 connectors (speciated based on ratio in HAPCalc defaults)
169 flanges (speciated based on ratio in HAPCalc defaults)
Compressor seals entered under "Other"

FACILITY EQUIPMENT:

REFERENCE COMPONENTS (EL PASO STATION)	per turbine:	per engine:	per aux. unit:	per scrubber:	per CT bay:
Valves (per unit):	212	25	6	14	8
Relief Valves (per unit):	4	2	1	0	1
Open-Ended Lines (per unit):	6	1	3	2	1
Compressor Seals (per unit):	2	See Below	0	0	0
Pump Seals (Liq. Service) (per unit):	0	0	0	0	0
Flanges & Connections (per unit):	403	143	28	38	16

	# turbines:	# engines:	# aux. units:	# scrubbers:	# CT bays:	TOTAL:
FACILITY INPUT=>	3	0	0	4	0	
Valves:	636	0	0	56	0	**692**
Relief Valves	12	0	0	0	0	**12**
Open-Ended Lines:	18	0	0	8	0	**26**
Compressor Seals:	6	0	0	0	0	**6**
Pump Seals (Liq. Service):	0	0	0	0	0	**0**
Flanges & Connections:	1,209	0	0	152	0	**1,361**

	# engines w/ 1 CYL:	# engines w/ 2 CYL:	# engines w/ 3 CYL:	# engines w/ 4 CYL:	# engines w/ 5 CYL:	TOTAL # Engine Compressor Seals:
ENGINE Compressor Seals ESTIMATION=>	0	0	0	0	0	0

El Paso Natural Gas Company, LLC

Afton Compressor Station

Unit: SSM/M
Description: Facility-wide blowdown events (SSM)

Gas Analysis (Typical)

VOC Weight %:	2%		Nominal
CO2 Weight %:	3%		Nominal
CH4 Weight %:	88%		Nominal
H2S Weight %:	0.016%		Nominal
Gas MW:	17	lb/lb-mol	Nominal
Gas molar volume:	378.61	scf/lb-mol	Constant
Gas density:	0.0449	lb/scf	Gas MW / Molar volume

Turbine Blowdown Venting (BD-unit)

SSM Emission Rates, per event

Event description: Planned maintenance and normal shutdown

Volume per event:	27	Mscf/event	Estimated, varies
VOC emissions:	24.2	lb/event	scf/event * lb/scf * %H2S
H2S emissions:	0.193	lb/event	scf/event * lb/scf * %VOC
CO2 emissions:	39.4	lb/event	scf/event * lb/scf * %CO2
CH4 emissions:	1063.4	lb/event	scf/event * lb/scf * %CH4

SSM Emission Rates, annual

Annual volume:	4512	Mscf/yr	Estimated, varies
VOC emissions:	2.0	tons/yr	scf/yr * lb/scf * %VOC * 1ton/2000lb
CO2 emissions:	3.3	tons/yr	scf/yr * lb/scf * %CO2 * 1ton/2000lb
CH4 emissions:	88.9	tons/yr	scf/yr * lb/scf * %CH4 * 1ton/2000lb

Turbine Gas Starting (BD-Unit)

SSM Emission Rates, per event

Event description: Normal startup

Volume per event:	150	Mscf/event	Estimated, varies
VOC emissions:	134.7	lb/event	scf/event * lb/scf * %VOC
CO2 emissions:	218.9	lb/event	scf/event * lb/scf * %CO2
CH4 emissions:	5907.9	lb/event	scf/event * lb/scf * %CH4

SSM Emission Rates, annual

Annual volume:	15670	Mscf/yr	Estimated, varies
VOC emissions:	7.0	tons/yr	scf/yr * lb/scf * %VOC * 1ton/2000lb
CO2 emissions:	11.4	tons/yr	scf/yr * lb/scf * %CO2 * 1ton/2000lb
CH4 emissions:	308.6	tons/yr	scf/yr * lb/scf * %CH4 * 1ton/2000lb

Facility Blowdown Venting (BD-ESD)

SSM Emission Rates, per event

Event description:	400	Mscf/event	
Volume per event:	400	Mscf/event	Estimated, varies
VOC emissions:	359.2	lb/event	scf/event * lb/scf * %VOC
CO2 emissions:	583.7	lb/event	scf/event * lb/scf * %CO2
CH4 emissions:	15754.512	lb/event	scf/event * lb/scf * %CH4

SSM Emission Rates, annual

Annual volume:	2200	Mscf/yr, historical data (2007 volume + 100% SF)	
VOC emissions:	1.0	tons/yr	scf/yr * lb/scf * %VOC * 1ton/2000lb
CO2 emissions:	1.6	tons/yr	scf/yr * lb/scf * %CO2 * 1ton/2000lb
CH4 emissions:	43.3	tons/yr	scf/yr * lb/scf * %CH4 * 1ton/2000lb

Total SSM Emissions, annual

VOC emissions:	10.0	tons/yr	
H2S emissions:	0.080	tons/yr	VOC emissions * H2S wt.% / VOC wt.%
Benezene	0.012	tons/yr	VOC emissions / Fug. VOC (tpy) * Fug HAP (tpy)
Toluene	0.021	tons/yr	VOC emissions / Fug. VOC (tpy) * Fug HAP (tpy)
Ethylbenzene	0.0010	tons/yr	VOC emissions / Fug. VOC (tpy) * Fug HAP (tpy)
Xylenes	0.0055	tons/yr	VOC emissions / Fug. VOC (tpy) * Fug HAP (tpy)
Total HAP	0.040	tons/yr	
CO2 emissions:	16.3	tons/yr	
CH4 emissions:	440.8	tons/yr	
GHG emissions:	11035.6	tons/yr CO2e	

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☐ If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
- ☑ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
- ☐ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
- ☐ If an older version of AP-42 is used, include a complete copy of the section.
- ☑ If an EPA document or other material is referenced, include a complete copy.
- ☐ Fuel specifications sheet.
- ☑ If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.

The following items were used to calculate the emissions for this facility:

· **Turbines:**
o GRI-HAPCalc Output
o 40 CFR 98 Subpart C, Tables C-1 and C-2
o Testing data

· **Fugitives:**
o 1993 Protocol for Equipment Leak Emission Estimates
o Facility Gas Analysis

GRI-HAPCalc ® 3.01
Turbine Report

Facility ID:	**KM AFTON**	**Notes:**
Operation Type:	**COMPRESSOR STATION**	
Facility Name:	**AFTON COMPRESSOR STATION**	
User Name:		
Units of Measure:	**U.S. STANDARD**	

Note: Emissions less than 5.00E-09 tons (or tonnes) per year are considered insignificant and are treated as zero. These emissions are indicated on the report with a "0". Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

Turbine Unit

Unit Name: A-1

Hours of Operation:	8,760	Yearly
Rate Power:	7150	hp
Fuel Type:	NATURAL GAS	
Emission Factor Set:	FIELD > EPA > LITERATURE	
Additional EF Set:	-NONE-	

Calculated Emissions (ton/yr)

Chemical Name	Emissions	Emission Factor	Emission Factor Set
HAPs			
PAHs	0.0007	0.00000970 g/bhp-hr	EPA
Formaldehyde	1.1683	0.01693680 g/bhp-hr	GRI Field
Acetaldehyde	1.1958	0.01733570 g/bhp-hr	GRI Field
1,3-Butadiene	0.0042	0.00006160 g/bhp-hr	GRI Field
Acrolein	0.0179	0.00026000 g/bhp-hr	GRI Field
Propional	0.0597	0.00086500 g/bhp-hr	GRI Field
Propylene Oxide	0.0088	0.00012730 g/bhp-hr	EPA
Benzene	0.0371	0.00053840 g/bhp-hr	GRI Field
Toluene	0.0284	0.00041100 g/bhp-hr	GRI Field
Ethylbenzene	0.0097	0.00014050 g/bhp-hr	EPA
Xylenes(m,p,o)	0.0858	0.00124410 g/bhp-hr	GRI Field
2,2,4-Trimethylpentane	0.1107	0.00160530 g/bhp-hr	GRI Field
n-Hexane	0.1039	0.00150580 g/bhp-hr	GRI Field
Phenol	0.0076	0.00011010 g/bhp-hr	GRI Field
Naphthalene	0.0005	0.00000760 g/bhp-hr	GRI Field
2-Methylnaphthalene	0.0001	0.00000130 g/bhp-hr	GRI Field
Biphenyl	0.0228	0.00033050 g/bhp-hr	GRI Field
Phenanthrene	0.0000	0.00000050 g/bhp-hr	GRI Field
Chrysene	0.0001	0.00000100 g/bhp-hr	GRI Field
Beryllium	0.0000	0.00000010 g/bhp-hr	GRI Field
Phosphorus	0.0045	0.00006520 g/bhp-hr	GRI Field
Chromium	0.0006	0.00000820 g/bhp-hr	GRI Field
Manganese	0.0012	0.00001750 g/bhp-hr	GRI Field
Nickel	0.0004	0.00000610 g/bhp-hr	GRI Field
Cobalt	0.0001	0.00000160 g/bhp-hr	GRI Field

Arsenic	0.0000	0.00000060 g/bhp-hr	GRI Field
Selenium	0.0000	0.00000030 g/bhp-hr	GRI Field
Cadmium	0.0000	0.00000020 g/bhp-hr	GRI Field
Mercury	0.0002	0.00000270 g/bhp-hr	GRI Field
Lead	0.0002	0.00000340 g/bhp-hr	GRI Field
Total	2.8693		

Criteria Pollutants

PM	1.9985	0.02897200 g/bhp-hr	EPA
CO	145.4298	2.10828420 g/bhp-hr	GRI Field
NMHC	13.3737	0.19387800 g/bhp-hr	GRI Field
NMEHC	0.6359	0.00921840 g/bhp-hr	EPA
NOx	86.3744	1.25216290 g/bhp-hr	GRI Field
SO2	0.0709	0.00102720 g/bhp-hr	GRI Field

Other Pollutants

Methane	68.0967	0.98719230 g/bhp-hr	GRI Field
Acetylene	0.4943	0.00716540 g/bhp-hr	GRI Field
Ethylene	0.9626	0.01395450 g/bhp-hr	GRI Field
Ethane	10.3528	0.15008370 g/bhp-hr	GRI Field
Propane	1.1037	0.01600000 g/bhp-hr	GRI Field
Isobutane	0.3311	0.00480000 g/bhp-hr	GRI Field
Butane	0.3587	0.00520000 g/bhp-hr	GRI Field
Cyclopentane	0.1139	0.00165110 g/bhp-hr	GRI Field
Butyrald/Isobutyraldehyde	0.0924	0.00134000 g/bhp-hr	GRI Field
n-Pentane	5.5977	0.08115000 g/bhp-hr	GRI Field
Cyclohexane	0.4224	0.00612400 g/bhp-hr	GRI Field
Methylcyclohexane	0.6092	0.00883120 g/bhp-hr	GRI Field
n-Octane	0.2200	0.00318890 g/bhp-hr	GRI Field
1,3,5-Trimethylbenzene	0.2069	0.00300000 g/bhp-hr	GRI Field
n-Nonane	0.0367	0.00053260 g/bhp-hr	GRI Field
CO2	33,308.1871	482.86607780 g/bhp-hr	EPA
Vanadium	0.0000	0.00000070 g/bhp-hr	GRI Field
Copper	0.0014	0.00002050 g/bhp-hr	GRI Field
Molybdenum	0.0014	0.00002030 g/bhp-hr	GRI Field
Barium	0.0016	0.00002290 g/bhp-hr	GRI Field

Unit Name: A-2

Hours of Operation: 8,760 Yearly

Rate Power: 7150 hp

Fuel Type: NATURAL GAS

Emission Factor Set: FIELD > EPA > LITERATURE

Additional EF Set: -NONE-

Calculated Emissions (ton/yr)

Chemical Name	Emissions	Emission Factor	Emission Factor Set
HAPs			
PAHs	0.0007	0.00000970 g/bhp-hr	EPA
Formaldehyde	1.1683	0.01693680 g/bhp-hr	GRI Field
Acetaldehyde	1.1958	0.01733570 g/bhp-hr	GRI Field
1,3-Butadiene	0.0042	0.00006160 g/bhp-hr	GRI Field
Acrolein	0.0179	0.00026000 g/bhp-hr	GRI Field

Propional	0.0597	0.00086500 g/bhp-hr	GRI Field
Propylene Oxide	0.0088	0.00012730 g/bhp-hr	EPA
Benzene	0.0371	0.00053840 g/bhp-hr	GRI Field
Toluene	0.0284	0.00041100 g/bhp-hr	GRI Field
Ethylbenzene	0.0097	0.00014050 g/bhp-hr	EPA
Xylenes(m,p,o)	0.0858	0.00124410 g/bhp-hr	GRI Field
2,2,4-Trimethylpentane	0.1107	0.00160530 g/bhp-hr	GRI Field
n-Hexane	0.1039	0.00150580 g/bhp-hr	GRI Field
Phenol	0.0076	0.00011010 g/bhp-hr	GRI Field
Naphthalene	0.0005	0.00000760 g/bhp-hr	GRI Field
2-Methylnaphthalene	0.0001	0.00000130 g/bhp-hr	GRI Field
Biphenyl	0.0228	0.00033050 g/bhp-hr	GRI Field
Phenanthrene	0.0000	0.00000050 g/bhp-hr	GRI Field
Chrysene	0.0001	0.00000100 g/bhp-hr	GRI Field
Beryllium	0.0000	0.00000010 g/bhp-hr	GRI Field
Phosphorus	0.0045	0.00006520 g/bhp-hr	GRI Field
Chromium	0.0006	0.00000820 g/bhp-hr	GRI Field
Manganese	0.0012	0.00001750 g/bhp-hr	GRI Field
Nickel	0.0004	0.00000610 g/bhp-hr	GRI Field
Cobalt	0.0001	0.00000160 g/bhp-hr	GRI Field
Arsenic	0.0000	0.00000060 g/bhp-hr	GRI Field
Selenium	0.0000	0.00000030 g/bhp-hr	GRI Field
Cadmium	0.0000	0.00000020 g/bhp-hr	GRI Field
Mercury	0.0002	0.00000270 g/bhp-hr	GRI Field
Lead	0.0002	0.00000340 g/bhp-hr	GRI Field
Total	2.8693		

Criteria Pollutants

PM	1.9985	0.02897200 g/bhp-hr	EPA
CO	145.4298	2.10828420 g/bhp-hr	GRI Field
NMHC	13.3737	0.19387800 g/bhp-hr	GRI Field
NMEHC	0.6359	0.00921840 g/bhp-hr	EPA
NOx	86.3744	1.25216290 g/bhp-hr	GRI Field
SO2	0.0709	0.00102720 g/bhp-hr	GRI Field

Other Pollutants

Methane	68.0967	0.98719230 g/bhp-hr	GRI Field
Acetylene	0.4943	0.00716540 g/bhp-hr	GRI Field
Ethylene	0.9626	0.01395450 g/bhp-hr	GRI Field
Ethane	10.3528	0.15008370 g/bhp-hr	GRI Field
Propane	1.1037	0.01600000 g/bhp-hr	GRI Field
Isobutane	0.3311	0.00480000 g/bhp-hr	GRI Field
Butane	0.3587	0.00520000 g/bhp-hr	GRI Field
Cyclopentane	0.1139	0.00165110 g/bhp-hr	GRI Field
Butyrald/Isobutyraldehyde	0.0924	0.00134000 g/bhp-hr	GRI Field
n-Pentane	5.5977	0.08115000 g/bhp-hr	GRI Field
Cyclohexane	0.4224	0.00612400 g/bhp-hr	GRI Field
Methylcyclohexane	0.6092	0.00883120 g/bhp-hr	GRI Field
n-Octane	0.2200	0.00318890 g/bhp-hr	GRI Field
1,3,5-Trimethylbenzene	0.2069	0.00300000 g/bhp-hr	GRI Field
n-Nonane	0.0367	0.00053260 g/bhp-hr	GRI Field
CO2	33,308.1871	482.86607780 g/bhp-hr	EPA
Vanadium	0.0000	0.00000070 g/bhp-hr	GRI Field

Copper	0.0014	0.00002050 g/bhp-hr	GRI Field
Molybdenum	0.0014	0.00002030 g/bhp-hr	GRI Field
Barium	0.0016	0.00002290 g/bhp-hr	GRI Field

Unit Name: A-3

Hours of Operation: 8,760 Yearly

Rate Power: 7150 hp

Fuel Type: NATURAL GAS

Emission Factor Set: FIELD > EPA > LITERATURE

Additional EF Set: -NONE-

Calculated Emissions (ton/yr)

Chemical Name	Emissions	Emission Factor	Emission Factor Set
HAPs			
PAHs	0.0007	0.00000970 g/bhp-hr	EPA
Formaldehyde	1.1683	0.01693680 g/bhp-hr	GRI Field
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Chrysene	0.0001	0.00000100 g/bhp-hr	GRI Field
Beryllium	0.0000	0.00000010 g/bhp-hr	GRI Field
Phosphorus	0.0045	0.00006520 g/bhp-hr	GRI Field
Chromium	0.0006	0.00000820 g/bhp-hr	GRI Field
Manganese	0.0012	0.00001750 g/bhp-hr	GRI Field
Nickel	0.0004	0.00000610 g/bhp-hr	GRI Field
Cobalt	0.0001	0.00000160 g/bhp-hr	GRI Field
Arsenic	0.0000	0.00000060 g/bhp-hr	GRI Field
Selenium	0.0000	0.00000030 g/bhp-hr	GRI Field
Cadmium	0.0000	0.00000020 g/bhp-hr	GRI Field
Mercury	0.0002	0.00000270 g/bhp-hr	GRI Field
Lead	0.0002	0.00000340 g/bhp-hr	GRI Field
Total	2.8693		
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SO2	0.0709	0.00102720 g/bhp-hr	GRI Field

Other Pollutants

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Ethane	10.3528	0.15008370 g/bhp-hr	GRI Field
Propane	1.1037	0.01600000 g/bhp-hr	GRI Field
Isobutane	0.3311	0.00480000 g/bhp-hr	GRI Field
Butane	0.3587	0.00520000 g/bhp-hr	GRI Field
Cyclopentane	0.1139	0.00165110 g/bhp-hr	GRI Field
Butyrald/Isobutyraldehyde	0.0924	0.00134000 g/bhp-hr	GRI Field
n-Pentane	5.5977	0.08115000 g/bhp-hr	GRI Field
Cyclohexane	0.4224	0.00612400 g/bhp-hr	GRI Field
Methylcyclohexane	0.6092	0.00883120 g/bhp-hr	GRI Field
n-Octane	0.2200	0.00318890 g/bhp-hr	GRI Field
1,3,5-Trimethylbenzene	0.2069	0.00300000 g/bhp-hr	GRI Field
n-Nonane	0.0367	0.00053260 g/bhp-hr	GRI Field
CO2	33,308.1871	482.86607780 g/bhp-hr	EPA
Vanadium	0.0000	0.00000070 g/bhp-hr	GRI Field
Copper	0.0014	0.00002050 g/bhp-hr	GRI Field
Molybdenum	0.0014	0.00002030 g/bhp-hr	GRI Field
Barium	0.0016	0.00002290 g/bhp-hr	GRI Field

98.36(e)(3)

Within 30 days of receipt of a written request from the Administrator, you shall submit explanations of the following:

98.36(e)(3)(i)

An explanation of how company records are used to quantify fuel consumption, if the Tier 1 or Tier 2 Calculation Methodology is used to calculate CO_2 emissions.

98.36(e)(3)(ii)

An explanation of how company records are used to quantify fuel consumption, if solid fuel is combusted and the Tier 3 Calculation Methodology is used to calculate CO_2 emissions.

98.36(e)(3)(iii)

An explanation of how sorbent usage is quantified.

98.36(e)(3)(iv)

An explanation of how company records are used to quantify fossil fuel consumption in units that uses CEMS to quantify CO_2 emissions and combusts both fossil fuel and biomass.

98.36(e)(3)(v)

An explanation of how company records are used to measure steam production, when it is used to calculate CO_2 mass emissions under §98.33(a)(2)(iii) or to quantify solid fuel usage under §98.33(c)(3).

98.36(e)(4)

Within 30 days of receipt of a written request from the Administrator, you shall submit the verification data and information described in paragraphs (e)(2)(iii), (e)(2)(v), and (e)(2)(vii) of this section.

[Amended at 75 FR page 79151, Dec. 17, 2010]

§ 98.37 Records that must be retained.

In addition to the requirements of §98.3(g), you must retain the applicable records specified in §§98.34(f) and (g), 98.35(b), and 98.36(e).

§ 98.38 Definitions.

All terms used in this subpart have the same meaning given in the Clean Air Act and subpart A of this part.

Table C-1 to Subpart C of Part 98 —Default CO_2 Emission Factors and High Heat Values for Various Types of Fuel

Fuel type	Default high heat value	Default CO_2 emission factor
Coal and coke	mmBtu/short ton	kg CO_2 /mmBtu
Anthracite	25.09	103.54
Bituminous	24.93	93.40
Subbituminous	17.25	97.02
Lignite	14.21	96.36
Coke	24.80	102.04
Mixed (Commercial sector)	21.39	95.26
Mixed (Industrial coking)	26.28	93.65
Mixed (Industrial sector)	22.35	93.91
Mixed (Electric Power sector)	19.73	94.38
Natural gas	mmBtu/scf	kg CO_2 /mmBtu
(Weighted U.S. Average)	1.028×10^{-3}	53.02
Petroleum products	mmBtu/gallon	kg CO_2 /mmBtu
Distillate Fuel Oil No. 1	0.139	73.25
Distillate Fuel Oil No. 2	0.138	73.96

Distillate Fuel Oil No. 4	0.146	75.04
Residual Fuel Oil No. 5	0.140	72.93
Residual Fuel Oil No. 6	0.150	75.10
Used Oil	0.135	74.00
Kerosene	0.135	75.20
Liquefied petroleum gases (LPG)	0.092	62.98
Propane	0.091	61.46
Propylene	0.091	65.95
Ethane	0.069	62.64
Ethanol	0.084	68.44
Ethylene	0.100	67.43
Isobutane	0.097	64.91
Isobutylene	0.103	67.74
Butane	0.101	65.15
Butylene	0.103	67.73
Naphtha (<401 deg F)	0.125	68.02
Natural Gasoline	0.110	66.83
Other Oil (>401 deg F)	0.139	76.22
Pentanes Plus	0.110	70.02
Petrochemical Feedstocks	0.129	70.97
Petroleum Coke	0.143	102.41
Special Naphtha	0.125	72.34
Unfinished Oils	0.139	74.49
Heavy Gas Oils	0.148	74.92
Lubricants	0.144	74.27
Motor Gasoline	0.125	70.22
Aviation Gasoline	0.120	69.25
Kerosene-Type Jet Fuel	0.135	72.22
Asphalt and Road Oil	0.158	75.36
Crude Oil	0.138	74.49
Other fuels-solid.	mmBtu/short ton	kg CO_2 /mmBtu
Municipal Solid Waste	9.95 [1]	90.7
Tires	26.87	85.97
Plastics	38.00	75.00
Petroleum Coke	30.00	102.41
Other fuels (gaseous)	mmBtu/scf	kg CO_2 /mmBtu
Blast Furnace Gas	0.092 x 10-3	274.32
Coke Oven Gas	0.599 x 10-3	46.85
Propane Gas	2.516 x 10-3	61.46
Fuel Gas [2]	1.388 x 10-3	59.00
Biomass fuels—solid	mmBtu/short ton	kg CO_2 /mmBtu
Wood and Wood Residuals	15.38	93.80
Agricultural Byproducts	8.25	118.17
Peat	8.00	111.84
Solid Byproducts	25.83	105.51
Biomass fuels—gaseous	mmBtu/scf	kg CO_2 /mmBtu
Biogas (Captured methane)	0.841 x 10-3	52.07
Biomass Fuels—Liquid	mmBtu/gallon	kg CO_2 /mmBtu
Ethanol	0.084	68.44
Biodiesel	0.128	73.84

Rendered Animal Fat	0.125	71.06
Vegetable Oil	0.120	81.55

[1] Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and are allowed to use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and/or tires; and (c) small batch incinerators that combust no more than 1,000 tons of MSW per year.

[2] Reporters subject to subpart X of this part that are complying with § 98.243(d) or subpart Y of this part may only use the default HHV and the default CO_2 emission factor for fuel gas combustion under the conditions prescribed in § 98.243(d)(2)(i) and (d)(2)(ii) and § 98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

Table C-2 to Subpart C of Part 98 —Default CH_4 and N_2O Emission Factors for Various Types of Fuel

Default CH_4 and N_2O Emission Factors for Various Types of Fuel

Fuel type	Default CH_4 emission factor (kg CH_4/mmBtu)	Default N_2O emission factor (kg N_2O/mmBtu)
Coal and Coke (All fuel types in Table C-1)	1.1 x 10-02	1.6 x 10-03
Natural Gas	1.0 x 10-03	1.0 x 10-04
Petroleum (All fuel types in Table C-1)	3.0 x 10-03	6.0 x 10-04
Municipal Solid Waste	3.2 x 10-02	4.2 x 10-03
Tires	3.2 x 10-02	4.2 x 10-03
Blast Furnace Gas	2.2 x 10-05	1.0 x 10-04
Coke Oven Gas	4.8 x 10-04	1.0 x 10-04
Biomass Fuels—Solid (All fuel types in Table C-1)	3.2 x 10-02	4.2 x 10-03
Biogas	3.2 x 10-03	6.3 x 10-04
Biomass Fuels—Liquid (All fuel types in Table C-1)	1.1 x 10-03	1.1 x 10-04

Note: Those employing this table are assumed to fall under the IPCC definitions of the “Energy Industry” or “Manufacturing Industries and Construction”. In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC “Energy Industry” category may employ a value of 1g of CH_4/mmBtu.

[75 FR page 79154, Dec. 17, 2010]

El Paso Natural Gas Company, LLC							
Afton Compressor Station							
Facility Name	Source ID	Manuf.	Type	Model	NOx g/hphr	CO g/hphr	THC g/hphr
Bowie	A-1	GE	Turbine	M3122R	1.53	0.13	0.59
Bowie	A-1	GE	Turbine	M3122R	1.95	0.09	0.19
Caprock	A-1	GE	Turbine	M3702R	2.63	3.30	0.05
Caprock	A-2	GE	Turbine	M3572R	1.91	3.77	0.11
Caprock	A-2	GE	Turbine	M3572R	2.06	1.44	0.04
Caprock	A-1	GE	Turbine	M3702R	1.94	1.32	0.02
Caprock	A-2	GE	Turbine	M3572R	1.87	0.57	0.02
Caprock	A-1	GE	Turbine	M3702R	1.82	0.45	0.03
Cornudas	A-3	GE	Turbine	M3712R	2.07	1.23	0.27
Cornudas	A-3	GE	Turbine	M3712R	1.91	0.70	0.18
Cornudas	A-3	GE	Turbine	M3712R	1.99	0.29	0.07
Dilkon	B-1	GE	Turbine	M3142R	2.81	0.00	NA
El Paso	C-1	GE	Turbine	M3102R	2.92	0.39	0.21
El Paso	C-1	GE	Turbine	M3102R	2.75	0.18	0.33
Gallup	B-1	GE	Turbine	M3962R	2.46	0.68	NA
Gallup	B-1	GE	Turbine	M3962R	2.14	0.20	NA
Gallup	B-1	GE	Turbine	M3962R	2.06	0.08	NA
Gallup	B-1	GE	Turbine	M3962R	1.91	0.20	NA
Gallup	B-1	GE	Turbine	M3962R	2.06	0.02	NA
Gallup	B-1	GE	Turbine	M3962R	2.55	0.15	NA
Gallup	B-1	GE	Turbine	M3962R	2.27	0.14	NA
Gallup	B-1	GE	Turbine	M3962R	2.25	0.05	NA
Hackberry	A-2	GE	Turbine	M3962R	2.76	0.05	NA
Hackberry	A-2	GE	Turbine	M3962R	2.67	0.05	NA
Hackberry	A-2	GE	Turbine	M3962R	2.65	0.05	NA
Hackberry	A-1	GE	Turbine	M3962R	2.45	NA	NA
Hackberry	A-1	GE	Turbine	M3962R	2.35	NA	NA
Hackberry	A-1	GE	Turbine	M3962R	2.28	NA	NA
Leupp	C-1	GE	Turbine	M3702R	2.53	0.44	0.12
Leupp	C-1	GE	Turbine	M3702R	2.54	0.12	0.05
Leupp	C-1	GE	Turbine	M3702R	2.34	0.11	0.04
Lincoln	B-1	GE	Turbine	M3142R	2.27	0.24	0.05
Lincoln	B-1	GE	Turbine	M3142R	2.10	0.17	0.03
Lincoln	B-1	GE	Turbine	M3142R	2.20	0.17	0.04
Lincoln	B-1	GE	Turbine	M3142R	1.71	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	1.76	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	1.80	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	2.39	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	2.49	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	2.40	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	2.33	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	2.35	0.00	0.01
Lincoln	B-1	GE	Turbine	M3142R	2.32	0.00	0.01
San Simon	A-1	GE	Turbine	M3672R	1.83	0.67	1.73
San Simon	A-3	GE	Turbine	M3672R	1.30	0.78	0.50
San Simon	A-1	GE	Turbine	M3672R	1.28	0.49	0.82
San Simon	A-3	GE	Turbine	M3672R	1.55	1.13	0.39
San Simon	A-3	GE	Turbine	M3672R	1.74	0.94	0.30
San Simon	A-2	GE	Turbine	M3672R	1.28	0.40	0.22
San Simon	A-1	GE	Turbine	M3672R	1.39	0.41	0.78
Seligman	A-1	GE	Turbine	M3962R	2.73	NA	NA
Seligman	A-1	GE	Turbine	M3962R	3.21	NA	NA
Seligman	A-1	GE	Turbine	M3962R	2.45	NA	NA
Vail	A-2	GE	Turbine	M3672R	1.85	1.48	0.03
Vail	A-1	GE	Turbine	M3672R	2.20	1.05	0.02
Vail	A-3	GE	Turbine	M3672R	1.99	1.23	0.03
Vail	A-1	GE	Turbine	M3672R	1.99	0.58	0.03
Vail	A-3	GE	Turbine	M3672R	1.91	0.62	0.02
Vail	A-2	GE	Turbine	M3672R	1.71	0.75	0.01
Vail	A-2	GE	Turbine	M3672R	1.85	0.55	0.02
Vail	A-1	GE	Turbine	M3672R	2.10	0.37	0.01
Vail	A-3	GE	Turbine	M3672R	1.89	0.41	0.01
Wenden	A-1	GE	Turbine	M3102R	2.54	0.12	0.02
Wenden	A-1	GE	Turbine	M3102R	3.11	0.02	0.02
Wenden	A-1	GE	Turbine	M3102R	2.76	0.10	0.02
Wenden	A-1	GE	Turbine	M3102R	2.79	0.06	NA
Wenden	A-1	GE	Turbine	M3102R	2.70	0.07	NA
Wenden	A-1	GE	Turbine	M3102R	2.34	0.37	NA
Wenden	A-1	GE	Turbine	M3102R	2.68	0.04	NA
White Rock	A-1	GE	Turbine	M3962R	2.71	0.58	0.10

White Rock	A-1	GE	Turbine	M3962R	2.07	0.28	0.02
White Rock	A-1	GE	Turbine	M3962R	2.02	0.53	NA
White Rock	A-2	GE	Turbine	M3142R	4.77	0.56	NA
White Rock	A-1	GE	Turbine	M3962R	2.36	0.35	NA
White Rock	A-2	GE	Turbine	M3142R	2.14	0.05	0.01
White Rock	A-1	GE	Turbine	M3962R	2.22	0.15	0.01
White Rock	A-1	GE	Turbine	M3962R	2.54	0.21	NA
White Rock	A-2	GE	Turbine	M3142R	2.41	0.01	0.01
White Rock	A-2	GE	Turbine	M3142R	2.79	0.15	NA
White Rock	A-1	GE	Turbine	M3962R	2.78	0.20	NA
White Rock	A-1	GE	Turbine	M3962R	2.72	0.03	0.02
White Rock	A-2	GE	Turbine	M3142R	2.48	0.00	0.01
White Rock	A-2	GE	Turbine	M3142R	3.34	0.11	NA
White Rock	A-2	GE	Turbine	M3142R	2.04	0.06	NA
White Rock	A-2	GE	Turbine	M3142R	2.63	0.00	0.01

PROJECT: **EPNG - TITLE V - AFTON COMPRESSOR STATION**

Gas-fuel Analysis:

Higher Heating Value: 1025.6 Btu/scf
Lower Heating Value: 925.0 Btu/scf

	FUEL MOLE % **	MW (lb/mol)	MOLE% * MW	FUEL WT %	THC MOLE %	MOLE% * MW	THC WT %	Density @Std Cond (lb/ft^3)	Density * MOLE% (lb/ft^3)	
N_2	2.610%	28.0134	0.7311	4.221%				0.0740	0.0019	
O_2	0.000%	32.0000	0.0000	0.000%				0.0845	0.0000	
CO_2	0.400%	44.0100	0.1760	1.016%				0.1162	0.0005	
CH_4	92.440%	16.0430	14.8301	85.617%	95.309%	15.2904	90.349%	0.0424	0.0392	
C_2H_6	3.560%	30.0700	1.0705	6.180%	3.670%	1.1037	6.522%	0.0794	0.0028	
C_3H_8	0.650%	44.0970	0.2866	1.655%	0.670%	0.2955	1.746%	0.1164	0.0008	
iC_4H_{10}	0.070%	58.1230	0.0407	0.235%	0.072%	0.0419	0.248%	0.1535	0.0001	
nC_4H_{10}	0.130%	58.1230	0.0756	0.436%	0.134%	0.0779	0.460%	0.1535	0.0002	
iC_5H_{12}	0.040%	72.1500	0.0289	0.167%	0.041%	0.0298	0.176%	0.1905	0.0001	
nC_5H_{12}	0.030%	72.1500	0.0216	0.125%	0.031%	0.0223	0.132%	0.1905	0.0001	
C_6H_{14}	0.070%	86.1770	0.0603	0.348%	0.072%	0.0622	0.368%	0.2275	0.0002	
C_7H_{16}	0.000%	100.2040	0.0000	0.000%	0.000%	0.0000	0.000%	0.2646	0.0000	
C_8H_{18}	0.000%	114.2310	0.0000	0.000%	0.000%	0.0000	0.000%	0.3016	0.0000	
C_9H_{20}	0.000%	128.2580	0.0000	0.000%	0.000%	0.0000	0.000%	0.3386	0.0000	
$C_{10}H_{22}$+	0.000%	142.2850	0.0000	0.000%	0.000%	0.0000	0.000%	0.3757	0.0000	
SUM	100.000%		**17.3215**	100.000%	100.000%	**16.9238**	100.000%		**0.0459**	<=Fuel Density
									0.5992	<=Sp Gravity

0.9476

	FUEL MOLE % **	MW (lb/mol)	LHV*** (Btu/scf)	LCV (Btu/scf)	HHV*** (Btu/scf)	HCV (Btu/scf)	COMBUSTION PRODUCTS: (scf/scf fuel) CO2***	H2O***	N2***	COMBUSTION AIR: (scf/scf fuel) O2***	N2***	AIR***
N_2	2.610%	28.0134	0.0	0.0	0.0	0.0	0.0000	0.0000	0.0261	0.0000	0.0261	0.0261
O_2	0.000%	32.0000	0.0	0.0	0.0	0.0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO_2	0.400%	44.0100	0.0	0.0	0.0	0.0	0.0040	0.0000	0.0000	0.0000	0.0000	0.0000
CH_4	92.440%	16.0430	909.4	840.6	1010.0	933.6	0.9244	1.8488	6.9607	1.8488	6.9607	8.8095
C_2H_6	3.560%	30.0700	1618.7	57.6	1769.6	63.0	0.0712	0.1068	0.4692	0.1246	0.4692	0.5938
C_3H_8	0.650%	44.0970	2314.9	15.0	2516.1	16.4	0.0195	0.0260	0.1223	0.0325	0.1223	0.1548
iC_4H_{10}	0.070%	58.1230	3000.4	2.1	3251.9	2.3	0.0028	0.0035	0.0171	0.0046	0.0171	0.0217
nC_4H_{10}	0.130%	58.1230	3010.8	3.9	3262.3	4.2	0.0052	0.0065	0.0318	0.0085	0.0318	0.0403
iC_5H_{12}	0.040%	72.1500	3699.0	1.5	4000.9	1.6	0.0020	0.0024	0.0120	0.0032	0.0120	0.0152
nC_5H_{12}	0.030%	72.1500	3706.9	1.1	4008.9	1.2	0.0015	0.0018	0.0090	0.0024	0.0090	0.0114
C_6H_{14}	0.070%	86.1770	4403.8	3.1	4755.9	3.3	0.0042	0.0049	0.0250	0.0067	0.0250	0.0317
C_7H_{16}	0.000%	100.2040	5100.0	0.0	5502.5	0.0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
C_8H_{18}	0.000%	114.2310	5796.1	0.0	6248.9	0.0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
C_9H_{20}	0.000%	128.2580	6493.2	0.0	6996.5	0.0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
$C_{10}H_{22}$+	0.000%	142.2850	7189.6	0.0	7742.9	0.0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
SUM	100.000%			925.0		1025.6	1.0348	2.0007	7.6734	2.0312	7.6734	9.7046

**from EPNG gas-fuel analysis
*** from PERRY'S CHEMICAL ENGINEERS' HANDBOOK, 6th Edition (Table 9-30) & GPSA ENGINEERING DATA BOOK, 10th Edition (Section 23) - all gas volumes corrected to 60F and 30" Hg (dry) (14.7346 psia)

			notes:
Total Stoichiometric Combustion Products:	10.7089	scf/scf gas burned	CO2 + H2O + N2
Total Stoichiometric Air Required:	9.7046	scf air/scf gas burned	O2 + N2

Weight % of non-methane, non-ethane HC (nmnehc) in the fuel-gas: 2.97%
Weight % of non-methane, non-ethane HC (nmnehc) in THC of the gas: 3.13%

United States
Environmental Protection
Agency

Office of Air Quality
Planning and Standards
Research Triangle Park NC 27711

EPA-453/R-93-026
JUNE 1993

AIR

EPA

Protocol for Equipment Leak Emission Estimates

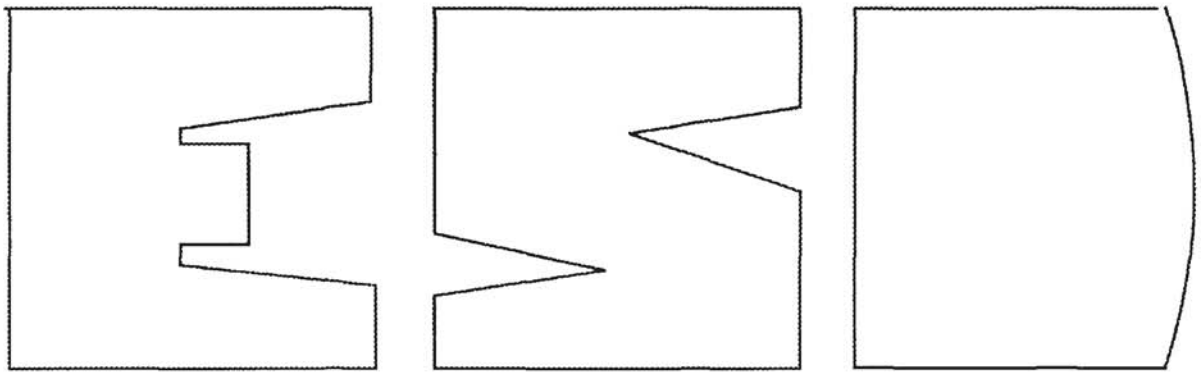


TABLE 2-3. GAS PLANT AVERAGE EMISSION FACTORS[a]

Equipment type	Service	Emission factor[b] (kg/hr/source)
Valves	All	0.020
Pump seals[c]	Liquid	0.063
Compressor seals	All	0.204
Pressure relief valves	All	0.188
Connectors	All	0.0011
Open-ended lines	All	0.022

[a]Source: Reference 3.

[b]These factors are for total organic compound emission rates.

[c]The pump seal factor can be used to estimate the leak rate from agitator seals.

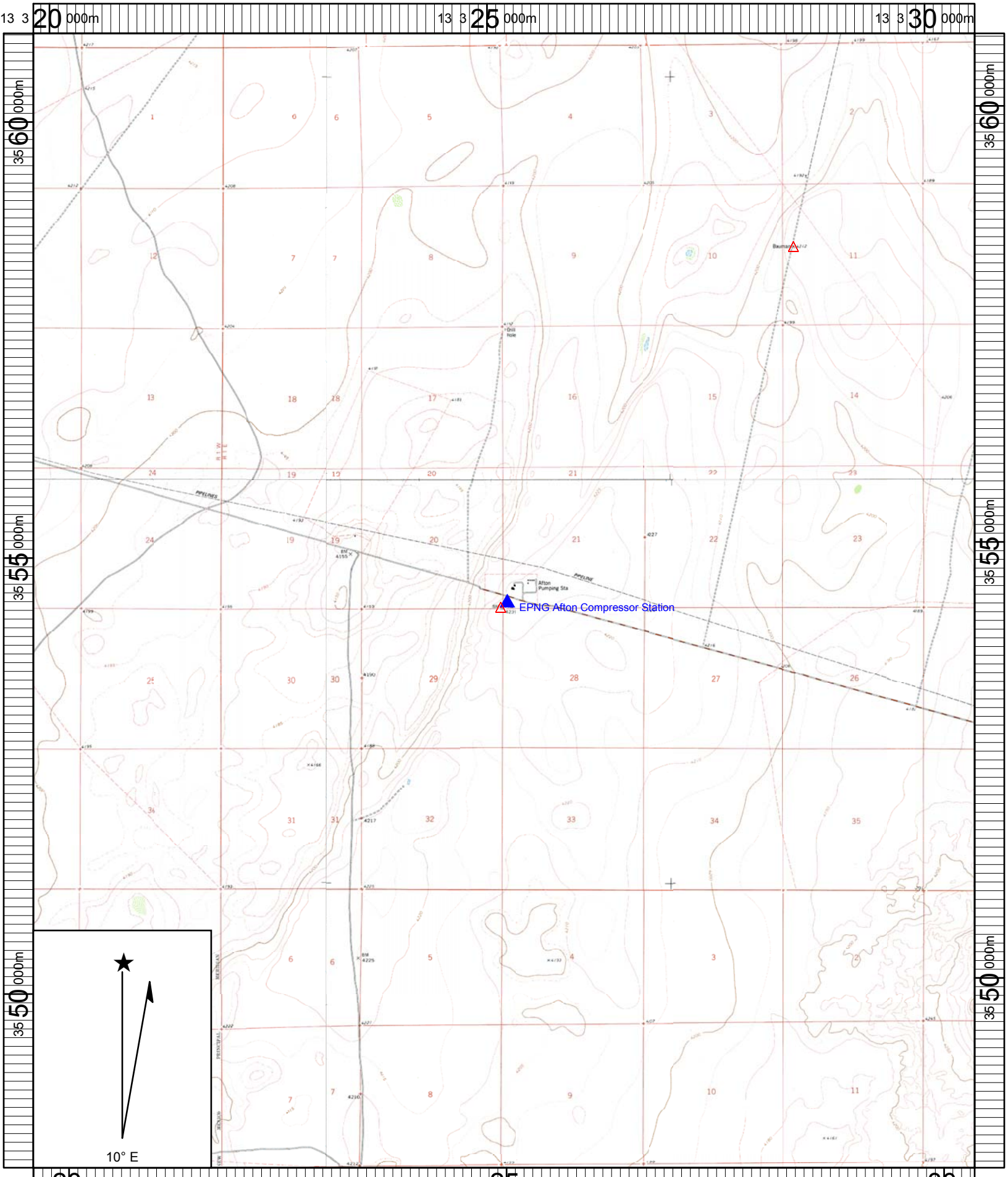
Section 8

Map(s)

A map such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

The UTM or Longitudinal coordinate system on both axes	An indicator showing which direction is north
A minimum radius around the plant of 0.8km (0.5 miles)	Access and haul roads
Topographic features of the area	Facility property boundaries
The name of the map	The area which will be restricted to public access
A graphical scale	

A map for the facility is attached.



Name: LITTLE BLACK MT
Date: 9/12/2008
Scale: 1 inch equals 4444 feet

Location: 13 0325082 E 3554420 N
Caption: Site Location
El Paso Natural Gas Company
Afton Compressor Station

Section 9

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)
(This proof is required by: 20.2.72.203.A.14 NMAC "Documentary Proof of applicant's public notice")

☑ **I have read the AQB "Guidelines for Public Notification for Air Quality Permit Applications"**
This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant's Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

New Permit and **Significant Permit Revision** public notices must include all items in this list.

Technical Revision public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

1. ☐ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
2. ☐ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
3. ☐ A copy of the property tax record (20.2.72.203.B NMAC).
4. ☐ A sample of the letters sent to the owners of record.
5. ☐ A sample of the letters sent to counties, municipalities, and Indian tribes.
6. ☐ A sample of the public notice posted and a verification of the local postings.
7. ☐ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
8. ☐ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
9. ☐ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
10. ☐ A copy of the display ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
11. ☐ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.

N/A – This application is being submitted under 20.2.70 NMAC.

Section 10

Written Description of the Routine Operations of the Facility

---

A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

Afton Compressor Station is a natural gas compressor station that compresses natural gas and delivers the compressed gas to a pipeline for mainline transportation. This facility consists primarily of three General Electric Company M3572R regenerative cycle turbines (units A-1, A-2 and A-3), powering the compressors. The facility is designed to compress and transport approximately 1350 MMscf per day of pipeline quality natural gas.

Section 11
Source Determination

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, Single Source Determination Guidance, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

A. Identify the emission sources evaluated in this section (list and describe)**:** Refer to Table 2-A

B. Apply the 3 criteria for determining a single source:

SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

☑ **Yes** ☐ **No**

Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source.

☑ **Yes** ☐ **No**

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

☑ **Yes** ☐ **No**

C. Make a determination:

☑ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "**YES**" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "**NO**" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.

☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

Section 12

Section 12.A
PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

A PSD applicability determination for all sources. For sources applying for a significant permit revision, apply the applicable requirements of 20.2.74.AG and 20.2.74.200 NMAC and to determine whether this facility is a major or minor PSD source, and whether this modification is a major or a minor PSD modification. It may be helpful to refer to the procedures for Determining the Net Emissions Change at a Source as specified by Table A-5 (Page A.45) of the EPA New Source Review Workshop Manual to determine if the revision is subject to PSD review.

A. This facility is:

- ☐ **a minor PSD source before and after this modification (if so, delete C and D below).**
- ☐ **a major PSD source before this modification. This modification will make this a PSD minor source.**
- ☐ **an existing PSD Major Source that has never had a major modification requiring a BACT analysis.**
- ☐ **an existing PSD Major Source that has had a major modification requiring a BACT analysis**
- ☐ **a new PSD Major Source after this modification.**

B. **This facility [is or is not] one of the listed 20.2.74.501 Table I – PSD Source Categories. The "project" emissions** for this modification are **[significant or not significant] [Discuss Why]. The "project" emissions listed below [do or do not] only result from changes described in this permit application, thus no emissions from other [revisions or modifications, past or future] to this facility. Also, specifically discuss whether this project results in "de-bottlenecking", or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:**

a. **NOx: XX.X TPY**
b. **CO: XX.X TPY**
c. **VOC: XX.X TPY**
d. **SOx: XX.X TPY**
e. **PM: XX.X TPY**
f. **PM10: XX.X TPY**
g. **PM2.5: XX.X TPY**
h. **Fluorides: XX.X TPY**
i. **Lead: XX.X TPY**
j. **Sulfur compounds (listed in Table 2): XX.X TPY**
k. **GHG: XX.X TPY**

C. **Netting [is required, and analysis is attached to this document.] OR [is not required (project is not significant)] OR [Applicant is submitting a PSD Major Modification and chooses not to net.]**

D. **BACT** is **[not required for this modification, as this application is a minor modification.] OR [required, as this application is a major modification. List pollutants subject to BACT review and provide a full top down BACT determination.]**

E. If this is an existing PSD major source, or any facility with emissions greater than 250 TPY (or 100 TPY for 20.2.74.501 Table 1 – PSD Source Categories), determine whether any permit modifications are related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.

N/A - This is a Title V Renewal application under Part 70.

Section 13

Determination of State & Federal Air Quality Regulations

This section lists each state and federal air quality regulation that may apply to your facility and/or equipment that are stationary sources of regulated air pollutants.

Not all state and federal air quality regulations are included in this list. Go to the Code of Federal Regulations (CFR) or to the Air Quality Bureau's regulation page to see the full set of air quality regulations.

Required Information for Specific Equipment:
For regulations that apply to specific source types, in the 'Justification' column **provide any information needed to determine if the regulation does or does not apply**. **For example**, to determine if emissions standards at 40 CFR 60, Subpart IIII apply to your three identical stationary engines, we need to know the construction date as defined in that regulation; the manufacturer date; the date of reconstruction or modification, if any; if they are or are not fire pump engines; if they are or are not emergency engines as defined in that regulation; their site ratings; and the cylinder displacement.

Required Information for Regulations that Apply to the Entire Facility:
See instructions in the 'Justification' column for the information that is needed to determine if an 'Entire Facility' type of regulation applies (e.g. 20.2.70 or 20.2.73 NMAC).

Regulatory Citations for Regulations That Do Not, but Could Apply:
If there is a state or federal air quality regulation that does not apply, but you have a piece of equipment in a source category for which a regulation has been promulgated, you must **provide the low level regulatory citation showing why your piece of equipment is not subject to or exempt from the regulation. For example** if you have a stationary internal combustion engine that is not subject to 40 CFR 63, Subpart ZZZZ because it is an existing 2 stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, your citation would be 40 CFR 63.6590(b)(3)(i). **We don't want a discussion of every non-applicable regulation, but if it is possible a regulation could apply, explain why it does not. For example,** if your facility is a power plant, you do not need to include a citation to show that 40 CFR 60, Subpart OOO does not apply to your non-existent rock crusher.

Regulatory Citations for Emission Standards:
For each unit that is subject to an emission standard in a source specific regulation, such as 40 CFR 60, Subpart OOO or 40 CFR 63, Subpart HH, include the low level regulatory citation of that emission standard. Emission standards can be numerical emission limits, work practice standards, or other requirements such as maintenance. **Here are examples:** a glycol dehydrator is subject to the general standards at 63.764C(1)(i) through (iii); an engine is subject to 63.6601, Tables 2a and 2b; a crusher is subject to 60.672(b), Table 3 and all transfer points are subject to 60.672(e)(1)

Federally Enforceable Conditions:
All federal regulations are federally enforceable. All Air Quality Bureau State regulations are federally enforceable except for the following: affirmative defense portions at 20.2.7.6.B, 20.2.7.110(B)(15), 20.2.7.11 through 20.2.7.113, 20.2.7.115, and 20.2.7.116; 20.2.37; 20.2.42; 20.2.43; 20.2.62; 20.2.63; 20.2.86; 20.2.89; and 20.2.90 NMAC. Federally enforceable means that EPA can enforce the regulation as well as the Air Quality Bureau and federally enforceable regulations can count toward determining a facility's potential to emit (PTE) for the Title V, PSD, and nonattainment permit regulations.

INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS RELEVENT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

EPA Applicability Determination Index for 40 CFR 60, 61, 63, etc: http://cfpub.epa.gov/adi/

Table for State Regulations:

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)	
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications. This is a Title V renewal application, therefore this facility is subject to this regulation and will comply with the requirements.	
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	No	N/A	This regulation does not apply to the facility because of the exemption in 20.2.3.9 NMAC, which states that the requirements of 20.2.3 NMAC are not applicable requirements under 20.2.70 NMAC.	
20.2.7 NMAC	Excess Emissions	Yes	Facility	This regulation establishes requirements for the facility if operations at the facility result in any excess emissions. The owner or operator will operate the source at the facility having an excess emission, to the extent practicable, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The facility will also notify the NMED of any excess emission per 20.2.7.110 NMAC. All Title V major sources are subject to Air Quality Control Regulations, as defined in 20.2.7 NMAC, and are thus subject to the requirements of this regulation.	
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	Afton Compressor Station does not have any existing gas burning equipment with a heat input of greater than 1,000,000 MMBtu/yr. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.33.108 NMAC.	
20.2.34 NMAC	Oil Burning Equipment: NO_2	No	N/A	This facility does not have any oil burning equipment with a heat input of greater than 1,000,000 MMBtu/yr. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.34.108 NMAC; therefore, this regulation does not apply.	
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This regulation establishes sulfur emission standards for natural gas processing plants. This facility does not meet the definition of a "natural gas processing plant", as defined in 20.2.35.7 NMAC.	
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	**These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.**	
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	This facility is not a tank battery operating in conjunction with a petroleum production or processing facility, as defined in 20.2.38.7 NMAC; Therefore, this facility is not subject to this regulation.	
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This regulation establishes sulfur emission standards for sulfur recovery plants which are not part of petroleum or natural gas processing facilities. Afton compressor station is not a sulfur recovery plant; therefore, it is not subject to this regulation.	
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	Yes	Units subject to 20.2.50 NMAC	This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NOx) for oil and gas production, processing, compression, and transmission sources. 20.2.50 NMAC subparts below: Include the construction status of applicable units as "New", "Existing", "Relocation of Existing", or "Reconstructed" as defined by this Part in your justification: Check the box for the subparts that	113: Units A-1, A-2 and A-3 are existing units and EPNG will comply with all applicable requirements of this rule and have submitted an ACP. EPNG will comply with the requirements of this subpart. 114—N/A—Reciprocating compressors located at transmission compressor stations are not subject to the requirements of 20.2.50.114 NMAC. 115—N/A—There are no Flares, ECDs, Thermal Oxidizers, or Vapor Recovery Units at this facility. 116: EPNG will comply with the requirements of this subpart.

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)	
				are applicable: ☒113 – Engines and Turbines ☐114 – Compressor Seals ☐115 – Control Devices and Closed Vent Systems ☒116 – Equipment Leaks and Fugitive Emissions ☐ 117 – Natural Gas Well Liquid Unloading ☐ 118 – Glycol Dehydrators ☐ 119 – Heaters ☐ 120 – Hydrocarbon Liquid Transfers ☐121 – Pig Launching and Receiving ☒122 – Pneumatic Controllers and Pumps ☐ 123 – Storage Vessels ☐124 – Well Workovers ☐ 125 – Small Business Facilities ☐126 – Produced Water Management Unit ☐127 – Flowback Vessels and Preproduction Operations	117—N/A—There are no natural gas wells with liquid unloading operations at this facility; therefore, this subpart does not apply. 118—N/A—there are no glycol dehydrator operations at this facility; therefore, this subpart does not apply. 119—N/A—There are no heaters located at this facility; therefore, this subpart does not apply. 120—N/A—there are no hydrocarbon liquid transfers located at this facility; therefore, this subpart does not apply. 121—N/A—there are no pipeline pig launching or receiving operations at this facility; therefore, this subpart does not apply. 122: EPNG will comply with the requirements of this subpart. 123—N/A—There are no permitted hydrocarbon storage vessels at this facility; therefore, this subpart does not apply. 124—N/A—There are no oil or natural gas wells located at this facility; therefore, this subpart does not apply. 125—N/A—This facility does not qualify as a small business facility; therefore, this subpart does not apply. 126—N/A—There are no produced water management units at this facility; therefore, this subpart does not apply. 127—N/A—There are no wells located at this facility; therefore, this subpart does not apply.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	A-1, A-2, A-3	This regulation establishes controls on smoke and visible emissions from certain sources, including stationary combustion equipment. Units A-1, A-2 and A-3 are stationary combustion equipment; therefore, this regulation applies to this facility.	
20.2.70 NMAC	Operating Permits	Yes	Facility	This regulation establishes requirements for obtaining an operating permit. Afton Compressor Station is a Title V major source and is therefore subject to this NMAC.	
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This regulation establishes a schedule of operating permit emission fees. The facility is subject to 20.2.70 NMAC and is therefore subject to requirements of this regulation	
20.2.72 NMAC	Construction Permits	Yes	Facility	This regulation establishes the requirements for obtaining a construction permit. This facility is subject to 20.2.72 NMAC and has been issued an NSR Permit.	

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	This regulation establishes emission inventory requirements. This facility meets the applicability requirements of 20.2.73.300 NMAC; therefore, this facility is subject to this regulation and will comply with all applicable reporting requirements under 20.2.73.300.B.1 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	Yes	Facility	This regulation establishes requirements for obtaining a prevention of significant deterioration permit. Afton Compressor Station is an existing PSD major source that is grandfathered from PSD permitting and the facility has not undergone a major modification.
20.2.75 NMAC	Construction Permit Fees	No	Facility	This regulation establishes a schedule of operating permit emission fees. The facility is subject to 20.2.71 NMAC (Operating Permit Emission Fees) and, therefore, is not subject to the requirements of this regulation, per 20.2.75.11.E. In the event of an NSR permit action, EPNG would be required to pay the appropriate filing and review fees.
20.2.77 NMAC	New Source Performance	No	N/A	This regulation establishes state authority to implement new source performance standards (NSPS) for stationary sources under 40 CFR Part 60. Afton Compressor Station does not have any units subject to a NSPS; therefore, this regulation does not apply.
20.2.78 NMAC	Emission Standards for HAPS	Yes (Potentially)	Facility	This facility could potentially emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61, as amended through January 31, 2009. In the case of asbestos demolition, one NESHAP would apply.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This regulation establishes the requirements for obtaining a nonattainment area permit. This facility is not located in a non-attainment area and is therefore not subject to this regulation.
20.2.80 NMAC	Stack Heights	No	N/A	This regulation establishes requirements for the evaluation of stack heights and other dispersion techniques. The units with emissions routed to a stack were constructed before December 31, 1970, and therefore is not subject to this regulation (20.2.80.110.A)
20.2.82 NMAC	MACT Standards for source categories of HAPS	No	N/A	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63 (MACT standards). The facility does not have any units subject to a MACT standard; therefore, this regulation does not apply.

Table for Applicable Federal Regulations

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 50	NAAQS	Yes	Facility	This regulation defines national ambient air quality standards. Afton Compressor Station will comply with applicable national ambient air quality standards for PM10, PM2.5, SO2, H2S, CO, and NOx under this regulation.
NSPS 40 CFR 60, Subpart A	General Provisions	No	N/A	This regulation defines general provisions for relevant standards that have been set under this part. The facility is not subject to this regulation because no NSPS Subparts apply.
NSPS 40 CFR60.40a, Subpart Da	Subpart Da, Performance Standards for **Electric Utility Steam Generating Units**	No	N/A	This regulation establishes standards of performance for electric utility steam generating units. This regulation does not apply because this facility does not operate any electric utility steam generating units

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
NSPS 40 CFR60.40b Subpart Db	**Electric Utility Steam Generating Units**	No	N/A	This regulation establishes standards of performance for industrial-commercial-institutional steam generating units. This regulation does not apply because this facility does not operate any industrial-commercial-institutional steam generating units.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	This regulation establishes standards of performance for industrial-commercial-institutional steam generating units. This regulation does not apply because this facility does not operate any industrial-commercial-institutional steam generating units.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for **Storage Vessels for Petroleum Liquids** for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and **Prior** to July 23, 1984	No	N/A	This regulation establishes performance standards for storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. The capacities of the tanks at the facility are less than 40,000 gallons and are therefore not subject to this regulation.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for **Volatile Organic Liquid Storage Vessels** (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced **After** July 23, 1984	No	N/A	This facility does not have any tanks with a storage capacity equal to or greater than 75 cubic meters used to store volatile organic liquids (VOL) for which construction, reconstruction or modification commenced after July 23, 1984; therefore, this regulation does not apply to this facility.
NSPS 40 CFR 60.330 Subpart GG	**Stationary Gas Turbines**	No	N/A	The General Electric regenerative cycle turbines at Afton Compressor Station were constructed prior to October 3, 1977. These turbines have not been modified or reconstructed since October 3, 1977. Accordingly, these units are not subject to this subpart.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from **Onshore Gas Plants**	No	N/A	This regulation defines standards of performance for equipment leaks of VOC emissions from onshore natural gas processing plants for which construction, reconstruction, or modification commenced after January 20, 1984, and on or before August 23, 2011. This regulation does not apply as the facility is not a gas plant.
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for **Onshore Natural Gas Processing**: SO_2 Emissions	No	N/A	This regulation establishes standards of performance for SO2 emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984 and on or before August 23, 2011. This regulation does not apply as this facility is not a natural gas processing plant.
NSPS 40 CFR Part 60 Subpart	Standards of Performance for	No	N/A	This regulation establishes standards of performance for crude oil and natural gas production, transmission and distribution. This facility does not have any affected

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
OOOO	Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015			units that have been constructed, modified or reconstructed on or after August 23, 2011, and is therefore not subject to this regulation.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced **After** September 18, 2015	No	N/A	This regulation establishes standards of performance for crude oil and natural gas production, transmission and distribution. The facility does not have any affected units that have been constructed, modified or reconstructed on or after September 18, 2015, and is therefore not subject to this regulation.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary compression ignition combustion engines. This regulation does not apply because this facility does not operate any stationary compression ignition combustion engines.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary spark ignition combustion engines. This facility does not have any Spark Ignition Internal Combustion Engines; therefore, this facility is not subject to this regulation.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This regulation establishes standards of performance for electric generating units. This regulation does not apply because this facility does not operate any electric generating units.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This regulation establishes standards of performance for electric generating units. This regulation does not apply because this facility does not operate any electric generating units.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	These regulations establish standards of performance for municipal solid waste landfills. This regulation does not apply because this facility is not a municipal solid waste landfill.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	This subpart applies to the owner or operator of any stationary source for which a standard is prescribed under this part. No subpart of 40 CFR 61 applies to this station. Therefore, this subpart does not apply
NESHAP 40 CFR 61 Subpart E	National Emission Standards for **Mercury**	No	N/A	This regulation establishes a national emission standard for mercury. The facility does not have stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge; therefore, this Subpart does not apply.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for **Equipment Leaks** (Fugitive Emission Sources)	No	N/A	This regulation establishes national emission standards for equipment leaks (fugitive emission sources). The facility does not have equipment that operates in volatile hazardous air pollutant (VHAP) service [40 CFR Part 61.240]. The regulated activities subject to this regulation do not take place at this facility. The facility is not subject to this regulation.
MACT 40 CFR 63, Subpart A	General Provisions	No	N/A	This regulation defines general provisions for relevant standards that have been set under this part. This facility does not have any units subject to a MACT standard and is therefore not subject to this Subpart.
MACT 40 CFR 63.760 Subpart HH	**Oil and Natural Gas Production Facilities**	No	N/A	This regulation establishes national emission standards for hazardous air pollutants from oil and natural gas production facilities. This facility is not an Oil or Natural Gas Production Facility, as defined by this regulation and is therefore not subject to this regulation
MACT 40 CFR 63 Subpart HHH		No	N/A	This facility is not a major source of HAPS, nor does it contain an affected unit. This facility does not contain an affected source; therefore it is not subject to this Subpart.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No	N/A	This regulation establishes national emission standards for HAP emissions from industrial, commercial, and institutional boilers and process heaters located at major sources of HAPs. This facility is not a major source of HAPs and, therefore, this regulation does not apply.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	These regulations establish standards of performance for coal and oil fire electric utility steam generating units. This regulation does not apply because this facility does not operate any coal or oil fire electric utility steam generating units.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal	No	N/A	This regulation defines national emissions standards for HAPs for stationary reciprocating Internal Combustion Engines. This facility does not have any RICE units.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Combustion Engines (**RICE MACT**)			
40 CFR 64	**Compliance Assurance Monitoring**	No	N/A	This regulation defines compliance assurance monitoring. Afton Compressor Station is a Title V major source. However, none of the units at the facility are required to use a control device to achieve compliance with an emission limit; therefore, this facility is not subject to this regulation.
40 CFR 68	**Chemical Accident Prevention**	No	N/A	This facility is regulated under DOT Office of Pipeline Safety Regulations (49 CFR 192, 193 and 195); therefore, it is not subject to this regulation. This regulation arises from section 112(r) of the Clean Air Act and establishes thresholds based on inventoried quantities of specific substances in process. As established at 40 CFR 68.3, the term "stationary source" does not apply to the transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR parts 192, 193, or 195 (DOT Office of Pipeline Safety Regulations).
Title IV – Acid Rain 40 CFR 72	**Acid Rain**	No	N/A	This station does not generate commercial electric power or electric power for sale. Therefore, this regulation is not applicable.
Title IV – Acid Rain 40 CFR 73	**Sulfur Dioxide** Allowance Emissions	No	N/A	This station does not generate commercial electric power or electric power for sale. Therefore, this regulation is not applicable.
Title IV-Acid Rain 40 CFR 75	**Continuous Emissions Monitoring**	No	N/A	This station does not generate commercial electric power or electric power for sale. Therefore, this regulation is not applicable.
Title IV – Acid Rain 40 CFR 76	**Acid Rain** Nitrogen Oxides **Emission Reduction Program**	No	N/A	This station does not generate commercial electric power or electric power for sale. Therefore, this regulation is not applicable.
Title VI – 40 CFR 82	Protection of **Stratospheric Ozone**	Yes	N/A	EPNG owns appliances containing CFCs and is therefore subject to this requirement. However, this requirement imposes no obligations on the facility beyond those imposed on any individual or corporate owner of such appliances, and is mentioned here only in the interest of being thorough. EPNG uses only certified technicians for the maintenance, service, repair and disposal of appliances and maintains the appropriate records for this requirement.

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

☑ **Title V Sources** (20.2.70 NMAC)**:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies** defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.

☐ **NSR** (20.2.72 NMAC)**, PSD** (20.2.74 NMAC) **& Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown** defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.

☑ **Title V** (20.2.70 NMAC)**, NSR** (20.2.72 NMAC)**, PSD** (20.2.74 NMAC) **& Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.

EPNG maintains the required planning and excess emission mitigation documents at Afton Compressor Station.

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

Construction Scenarios: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/. Compliance with standards must be maintained during construction, which should not usually be a problem unless simultaneous operation of old and new equipment is requested.

In this section, under the bolded title “Construction Scenarios”, specify any information necessary to write these conditions, such as: conservative-realistic estimated time for completion of construction of the various units, whether simultaneous operation of old and new units is being requested (and, if so, modeled), whether the old units will be removed or decommissioned, any PSD ramifications, any temporary limits requested during phased construction, whether any increase in emissions is being requested as SSM emissions or will instead be handled as a separate Construction Scenario (with corresponding emission limits and conditions, etc.

The term “alternative operating scenario” is not defined by regulation. EPNG understands this term to apply to one or more sources that may routinely operate with alternative fuels or raw materials and/or on a significantly different schedule that may potentially affect emissions. Based on this understanding, Afton Compressor Station does not have any alternative operating scenarios.

Units at the facility may be shut down from time to time due to factors including, but not limited to, market demand, maintenance, malfunctions, and emergency shutdowns. Operating in alternative modes and temporary shutdowns are not alternative operating scenarios, as EPNG understands them.

Section 16

Air Dispersion Modeling

1) Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions modeling requirements.
3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. **Note:** Neither modeling nor a modeling waiver is required for VOC emissions.	
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	X
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

Check each box that applies:

☐ See attached, approved modeling **waiver for all** pollutants from the facility.
☐ See attached, approved modeling **waiver for some** pollutants from the facility.
☐ Attached in Universal Application Form 4 (UA4) is a **modeling report for all** pollutants from the facility.
☐ Attached in UA4 is a **modeling report for some** pollutants from the facility.
☑ No modeling is required.

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

Compliance Test History Table

Unit No.	Test Description	Test Date
A-1	Portable analyzer for NOx and CO	7/13/2010, 06/11/2011 07/29/2020 10/20/2021 08/02/2022 08/15/2023
A-2	Portable analyzer for NOx and CO	02/02/2021 08/02/2022 08/15/2023
A-3	Portable analyzer for NOx and CO	7/14/2010, 12/11/2013, 10/01/2014, 11/08/2017 01/01/2019 06/05/2019 07/29/2020 06/17/2021

[1]The monitoring period exemption in B108.D(2) was invoked for periods with no testing.

Section 19

Requirements for Title V Program

Who Must Use this Attachment:

* Any major source as defined in 20.2.70 NMAC.
* Any source, including an area source, subject to a standard or other requirement promulgated under Section 111 - Standards of Performance for New Stationary Sources, or Section 112 Hazardous Air Pollutants, of the 1990 federal Clean Air Act ("federal Act"). Non-major sources subject to Sections 111 or 112 of the federal Act are exempt from the obligation to obtain an 20.2.70 NMAC operating permit until such time that the EPA Administrator completes rulemakings that require such sources to obtain operating permits. In addition, sources that would be required to obtain an operating permit solely because they are subject to regulations or requirements under Section 112(r) of the federal Act are exempt from the requirement to obtain an Operating Permit.
* Any Acid Rain source as defined under title IV of the federal Act. The Acid Rain program has additional forms. See www.env.nm.gov/air-quality/air-quality-title-v-operating-permits-guidance-page/. Sources that are subject to both the Title V and Acid Rain regulations are encouraged to submit both applications simultaneously.
* Any source in a source category designated by the EPA Administrator ("Administrator"), in whole or in part, by regulation, after notice and comment.

Afton Compressor Station is a major source, as defined in 20.2.70 NMAC.

19.1 - 40 CFR 64, Compliance Assurance Monitoring (CAM) (20.2.70.300.D.10.e NMAC)

Any source subject to 40CFR, Part 64 (Compliance Assurance Monitoring) must submit all the information required by section 64.7 with the operating permit application. The applicant must prepare a separate section of the application package for this purpose; if the information is already listed elsewhere in the application package, make reference to that location. Facilities not subject to Part 64 are invited to submit periodic monitoring protocols with the application to help the AQB to comply with 20.2.70 NMAC. Sources subject to 40 CFR Part 64, must submit a statement indicating your source's compliance status with any enhanced monitoring and compliance certification requirements of the federal Act.

After reasonable inquiry, EPNG states that the facility does not meet the applicability requirements of 40 CFR 64.2. Specifically, no sources at the facility are controlled major sources of regulated pollutants. EPNG will submit the necessary items should the facility or requirements change such that this regulation becomes applicable.

19.2 - Compliance Status (20.2.70.300.D.10.a & 10.b NMAC)

Describe the facility's compliance status with each applicable requirement at the time this permit application is submitted. This statement should include descriptions of or references to all methods used for determining compliance. This statement should include descriptions of monitoring, recordkeeping and reporting requirements and test methods used to determine compliance with all applicable requirements. Refer to Section 2, Tables 2-N and 2-O of the Application Form as necessary. (20.2.70.300.D.11 NMAC) For facilities with existing Title V permits, refer to most recent Compliance Certification for existing requirements. Address new requirements such as CAM, here, including steps being taken to achieve compliance.

EPNG believes that Afton Compressor Station is in compliance with each applicable requirement identified in Section 19.2. This belief was formed after reasonable inquiry. In the event that EPNG should discover new information affecting the compliance status of the facility, EPNG will make appropriate notification and/or take corrective action.

Pursuant to Condition 6.1 of Title V Permit P136-R3, EPNG has certified compliance with the terms of conditions of the permit. The most recent certification was submitted by the September 30th deadline. Since that time, EPNG has continued to be in compliance with applicable requirements.

19.3 - Continued Compliance (20.2.70.300.D.10.c NMAC)

Provide a statement that your facility will continue to be in compliance with requirements for which it is in compliance at the time of permit application. This statement must also include a commitment to comply with other applicable requirements as they come into effect during the permit term. This compliance must occur in a timely manner or be consistent with such schedule expressly required by the applicable requirement.

As described in Section 19.2, after reasonable inquiry EPNG states that Afton Compressor Station will continue to operate in compliance with applicable requirements. Additionally, EPNG will meet additional applicable requirements that become effective during the permit term in a timely manner or on such a time schedule as expressly required by the applicable requirement. In the event EPNG should discover new information affecting the compliance status of the facility, EPNG will make appropriate notifications and/or take corrective actions as appropriate.

19.4 - Schedule for Submission of Compliance (20.2.70.300.D.10.d NMAC)

You must provide a proposed schedule for submission to the department of compliance certifications during the permit term. This certification must be submitted annually unless the applicable requirement or the department specifies a more frequent period. A sample form for these certifications will be attached to the permit.

Conditions A109.B. and B105.C of Operating Permit P136-R4 requires EPNG to submit compliance certification reports to the New Mexico Environment Department (NMED) Air Quality Bureau (AQB) and to the EPA no later than September 30th of each year.

19.5 - Stratospheric Ozone and Climate Protection

In addition to completing the four (4) questions below, you must submit a statement indicating your source's compliance status with requirements of Title VI, Section 608 (National Recycling and Emissions Reduction Program) and Section 609 (Servicing of Motor Vehicle Air Conditioners).

---

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances? ☑ **Yes** ☐ **No**

2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? ☐ **Yes** ☑ **No**

   (If the answer is yes, describe the type of equipment and how many units are at the facility.)

3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? ☐ **Yes** ☑ **No**

4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.)

EPNG believes that Title VI, Section 608 (National Recycling and Emissions Reduction Program) of the Clean Air Act may apply to this facility. EPNG may own refrigeration equipment containing CFCs meeting the criteria of this Section, specifically 40 CFR 82, Subpart F, which applies to owners of CFC-containing appliances (40 CFR 82.150(b) and 40 CFR 82.152). EPNG

may own appliances affected by this subpart and abides by this regulation. EPNG is in compliance with the requirements of this Section.

19.6 - Compliance Plan and Schedule

Applications for sources, which are not in compliance with all applicable requirements at the time the permit application is submitted to the department, must include a proposed compliance plan as part of the permit application package. This plan shall include the information requested below:

A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)
A narrative description of your facility's compliance status with respect to all applicable requirements (as defined in 20.2.70 NMAC) at the time this permit application is submitted to the department.

B. Compliance plan: (20.2.70.300.D.11.B NMAC)
A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

C. Compliance schedule: (20.2.70.300D.11.c NMAC)
A schedule of remedial measures that you plan to take, including an enforceable sequence of actions with milestones, which will lead to compliance with all applicable requirements for your source. This schedule of compliance must be at least as stringent as that contained in any consent decree or administrative order to which your source is subject. The obligations of any consent decree or administrative order are not in any way diminished by the schedule of compliance.

D. Schedule of Certified Progress Reports: (20.2.70.300.D.11.d NMAC)
A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)
If your source is an acid rain source as defined by EPA, the following applies to you. For the portion of your acid rain source subject to the acid rain provisions of title IV of the federal Act, the compliance plan must also include any additional requirements under the acid rain provisions of title IV of the federal Act. Some requirements of title IV regarding the schedule and methods the source will use to achieve compliance with the acid rain emissions limitations may supersede the requirements of title V and 20.2.70 NMAC. You will need to consult with the Air Quality Bureau permitting staff concerning how to properly meet this requirement.

NOTE: The Acid Rain program has additional forms. See www.env.nm.gov/air-quality/air-quality-title-v-operating-permits-guidance-page/. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

EPNG states that after reasonable inquiry Afton Compressor Station is in compliance with the applicable requirements in this section. No compliance plan, compliance schedule, or compliance reports are required.

19.7 - 112(r) Risk Management Plan (RMP)

Any major sources subject to section 112(r) of the Clean Air Act must list all substances that cause the source to be subject to section 112(r) in the application. The permittee must state when the RMP was submitted to and approved by EPA.

Afton Compressor Station is not subject to the requirements of 40 CFR 68, Chemical Accident Prevention Provisions. The definitions in 40 CFR 68.3state the term “stationary source” does not apply to transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR Parts 192, 193 or 195 (DOT Office of Pipeline Safety Regulations). Afton Compressor Station is regulated under the DOT Office of Pipeline Safety Regulations and, therefore, is not subject to 112(r).

19.8 - Distance to Other States, Bernalillo, Indian Tribes and Pueblos

Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B NMAC)?

(If the answer is yes, state which apply and provide the distances.)

States: Texas (~26 km)

19.9 - Responsible Official

Provide the Responsible Official as defined in 20.2.70.7.AD NMAC:

Responsible Official: Ted Meinhold
R.O. Title: Vice President of Operations
R.O. Address: 1001 Louisiana, Houston TX 77002Phone: (520) 663-4224
R.O. Email: ted_meinhold@kindermorgan.com

Section 20

Other Relevant Information

Other relevant information. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

EPNG would like to identify the North American Energy Standards Board (NAESB) Day as the basis for records tracking at this facility and other facilities.

The United States uses six different standardized time zones from east to west; the energy industry uses a seventh time zone developed by the NAESB. This Board serves as an industry platform for the development and promotion of industry practices and standards that lead to the seamless marketing of wholesale and retail natural gas and electricity. Since 2003, the NAESB Day has been recognized by its customers, the business community, participants, and federal and state regulatory entities. As such, a NAESB Day is a 24-hour period derived from a uniform time zone that occurs simultaneously nationwide and is the basis of EPNG's COMET data acquisition system "day" data. Unit information defined and stored according to the NAESB Day includes monitored gas flows or volumes, hours of operation, maintenance and repair activities, and routine emissions.

Data obtained from outside agencies (including test reports and summaries) or submitted pursuant to 20.2.7 NMAC reporting requirements is based on the "day" as defined by the local time zone.

Section 22: Certification

Company Name: El Paso Natural Gas Co., LLC

I, Philip L. Baca, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 18th day of October, 2024, upon my oath or affirmation, before a notary of the State of Arizona.

Philip L Baca
*Signature

10-18-24
Date

Philip L. Baca
Printed Name

Director
Title

Scribed and sworn before me on this 18th day of October, 2024.

My authorization as a notary of the State of Arizona expires on the 27th day of December, 2025.

Kelley B. Sims
Notary's Signature

10/18/24
Date

Kelley B. Sims
Notary's Printed Name

KELLEY B SIMS
Notary Public - Arizona
Pima County
Commission # 618916
My Comm. Expires Dec 27, 2025

*For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC.